



Department of Education

Methods of Administration (MOA) Biennial Report

2022-23 and 2023-24

December 18, 2024

State of Iowa
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Des Moines, IA 50319-0146

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[Table of Organization](#)

MOA Coordinator

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Vision

Building an excellent education system that empowers all students to achieve their full potential.

Mission

Ensuring all students experience a world-class education.

Priorities

- Supporting a strong teacher pipeline through recruitment and retention
- Strengthening early literacy and evidence-based reading instruction
- Narrowing and closing achievement gaps through accountability and support
- Empowering students with multiple pathways to postsecondary success

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Coordinator's Message

The Iowa Department of Education has experienced a season of change during this past Methods of Administration (MOA) biennial reporting cycle. Under the leadership of a new Director, the Department has set new priorities including a renewed focus on early literacy, supporting a strong teacher pipeline, narrowing and closing achievement gaps, and empowering students with multiple pathways to postsecondary success. The Department's mission is to ensure all students experience a world-class education. And its vision is to build an excellent education system that empowers all students to achieve their full potential. Iowa's MOA plan and equity review process support the Department's mission, vision and priorities by ensuring that all of Iowa's students, regardless of race, color, national origin, sex, or disability, have equal access to high-quality career and technical education programs.

Since the last MOA biennial report in December 2022, personnel changes in the equity team have included the departure and retirement of several school improvement consultants and the education program consultant who conducted ADA accessibility reviews. Fortunately, these positions have now all been filled. The equity team has been able to maintain a high level of productivity and professionalism, and I am grateful for their efforts, their expertise, and their warm welcome when I joined the team in May 2023.

During the past two years, the equity team was able to build on strengths from previous reporting cycles, including close monitoring of subrecipients' Voluntary Compliance Plan (VCP) progress and providing ongoing technical assistance, closing out five subrecipients' outstanding noncompliance items from prior reporting cycles- which brought all noncompliance current to this biennial reporting cycle, and dedicating significant staff resources to the MOA equity review process. We implemented a new step communication protocol for noncompliance monitoring, and have included several such communications (letters, emails) in this report. Additionally, the team was able to make improvements based on the recommendations provided in the Department of Education Office of Civil Rights' response to the 2022 MOA biennial report, including requiring specificity in VCP target completion dates and encouraging subrecipients to remedy noncompliance items as soon as possible.

I am incredibly proud of our team's work and pleased to submit this report for your review.

SueAnn Johnson, MOA Coordinator

Staff Resources

The following provides an account of Department full-time employee (FTE) staff resources, including name, title, and role, during MOA program years 2022-23 and 2023-24.

2022-23

FTE	Staff Member
.45	SueAnn Johnson, Administrative Consultant, Equity Compliance <i>MOA Coordinator</i>
.20	Eric Heitz, Administrative Consultant <i>Lead, Equity Compliance Reviews</i>
.10	Scott Dreyer, Education Program Consultant <i>ADA Accessibility Reviews</i>
.15	Janet Boyd, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Buffy Campbell, School Improvement Consultant <i>Equity Compliance Reviews</i>
.10	Dennis McClain, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Sara Nickel, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Marietta Rives, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Pam Spangler, School Improvement Consultant <i>Equity Compliance Reviews</i>
1.6	Total FTE

2023-24

.45	SueAnn Johnson, Administrative Consultant, Equity Compliance <i>MOA Coordinator</i>
.15	Eric Heitz, Administrative Consultant <i>Lead, Equity Compliance Reviews</i>
.10	Scott Dreyer, Education Program Consultant <i>ADA Accessibility Reviews</i>

.10	Mike Wright, Education Program Consultant <i>ADA Accessibility Reviews</i>
.10	Janet Boyd, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Buffy Campbell, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Dennis McClain, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Sara Nickel, School Improvement Consultant <i>Equity Compliance Reviews</i>
.10	Marietta Rives, School Improvement Consultant <i>Equity Compliance Reviews</i>
.15	Pam Spangler, School Improvement Consultant <i>Equity Compliance Reviews</i>
1.6	Total FTE

Community Colleges 2022-23 & 2023-24

.45	SueAnn Johnson, Administrative Consultant, Equity Compliance <i>MOA Coordinator</i>
.10	Amy Gieseke, Bureau Chief, Division of Community Colleges
.25	Kelly Friesleben, Education Consultant for Student Success <i>Equity Compliance Reviews</i>
.10	Scott Dryer, Education Program Consultant <i>ADA Accessibility Reviews</i>
.10	Mike Wright, Education Program Consultant <i>ADA Accessibility Reviews</i>
.10	Total FTE

Roles and Responsibilities

The following information provides a high-level overview for the roles and responsibilities the Department allocates for the MOA program.

MOA Coordinator

The Department created a new position, Administrative Consultant, Equity Compliance, and filled this position in May 2023. The position was created to administer the MOA program and serve as a subject matter expert for the Department in the areas of equity and civil rights.

Responsibilities include:

- Communicates with the U.S. Office for Civil Rights;
- Coordinates Department efforts for MOA resource allocation, data collection, and reporting efforts;
- Drafts all required reports for the U.S. Office for Civil Rights; and
- Oversight of all aspects of the equity and ADA accessibility reviews and responses.

ADA Accessibility Reviews

Responsibilities include:

- Conducting accessibility reviews;
- Drafting accessibility compliance reports;
- Selecting and scheduling reviews with selected local education agencies (LEA) and community colleges;
- Training team leaders and team members on ADA accessibility compliance and reviews;
- Providing orientation for participating educational agencies;
- Conducting internal communications;
- Leading on-site visitation teams;
- Drafting and editing voluntary compliance plans (VCPs);
- Coordinating any follow-up processes, post visit, including follow-up visits; and
- Completing record keeping and documentation of noncompliance corrections.

Equity Compliance Reviews

Responsibilities include:

- Conducting equity compliance reviews;
- Drafting the equity compliance reports;
- Selecting and scheduling local education agencies (LEAs) for review;
- Annually developing and revising equity review manuals and other relevant materials;
- Providing orientation for participating local educational agencies (LEAs);
- Creating and coordinating staff assignments for equity review teams;
- Communicating internally with MOA equity team and MOA Coordinator;
- Leading on-site visitation teams;
- Drafting and editing the letter of findings (LOF);
- Drafting and editing the voluntary compliance plans (VCP);
- Coordinating any follow-up processes, post visit, including follow-up visits; and
- Completing record keeping and documentation of noncompliance corrections.

Community Colleges Equity Compliance Reviews

Responsibilities include:

- Conducting equity compliance reviews;
- Coordinating the completion of the ADA accessibility reviews with internal staff;
- Drafting the equity and ADA accessibility compliance review reports;
- Selecting the community colleges to be reviewed and scheduling reviews;
- Annually developing and revising the equity review manuals and other relevant materials;
- Training team leaders and team members;
- Providing orientation for participating community colleges;
- Creating and coordinating staff assignments for equity review team;
- Communicating internally with MOA equity team and MOA Coordinator;
- Leading on-site visitation teams;
- Drafting and editing the letter of findings (LOF);
- Drafting and editing the voluntary compliance plans (VCP);
- Coordinating any follow-up processes, post visit, including follow-up visits; and
- Completing record keeping and documentation of noncompliance corrections.

Review of State Policies

New State policies and procedures were reviewed and none were found to be discriminatory.

Monitoring Review Noncompliance and Corrective Actions 2023-2024 School Year

Monitoring Reviews Completed

The department monitors the following components for district and state accredited public and nonpublic schools. The following monitoring review information was retrieved from the department Consolidated Accountability and Support Application (CASA) for the 2023-2024 school year and from other monitoring systems.

Monitoring Review	Number Reviewed	Number of Noncompliance Items
<p>Preschool</p> <p>Information is collected for all Statewide Voluntary Preschool Programs, Shared Visions Preschool Programs implementing IQPPS, and all early childhood sessions serving one or more students with an individualized education program (IEP) so that the State can issue session ID numbers, which are used for Student Reporting in Iowa (SRI) to ensure compliance with requirements under Iowa Code 256C.3(4)c, IAC 281-16.13, and IAC 281-64.15.</p>	326	1
<p>K-12 Public Accreditation Desk Audit</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of local education agencies (LEAs). Accreditation monitoring requires a comprehensive desk audit of all accredited LEAs. Iowa Code 256.11(10)(a)(1)</p>	326	64
<p>K-12 Nonpublic State Accreditation Desk Audit</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of state-accredited nonpublic schools. Accreditation monitoring requires a comprehensive desk audit of all state-accredited nonpublic schools. Iowa Code § 256.11(10)(a)(1)</p>	116	4
<p>Focused Equity Review</p> <p>The purpose of the focused equity review is to ensure school districts meet federal civil rights laws. Laws include:</p> <ul style="list-style-type: none"> • Title VI of 1964 Civil Rights Act (race, color and national origin equity) • Title IX of the Educational Amendments of 1972 (sex equity) • Section 504 of the Rehabilitation Act of 1973 (disability equity) • Americans with Disabilities Act (ADA) of 1990 (disability 	10	176

Monitoring Review	Number Reviewed	Number of Noncompliance Items
equity)		
<p>IDEA Part B Desk Audit</p> <p>The Part B Desk Audit is an examination of district wide data for students with disabilities ages 3-21. Historically, these data were used for Part B determinations of successful implementation of IDEA Part B. The department will continue to make determinations, required by section 616 of the Individuals with Disabilities Education Act (IDEA), as an integrated piece of the differentiated accountability desk audit process. Performance and compliance data will be used to determine how successfully a district is implementing IDEA Part B and the level of support to which the district will be assigned.</p>	326	
<p>Intensive Preschool Desk Audit</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of schools and school districts. Accreditation monitoring requires a comprehensive desk audit of all accredited schools and school districts. Iowa Code 256.11(10)(a)(1)</p> <p>The monitoring system shall ensure that programs meet the provisions herein requiring a properly licensed teacher and adoption of program standards. IAC 281—16.14</p>	3	0
<p>Preschool Desk Audit, Evidence of IQPPS Implementation</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of schools and school districts. Accreditation monitoring requires a comprehensive desk audit of all accredited preschool programs. Iowa Code 256.11(10)(a)(1)</p>	290	0
<p>USDA Child Nutrition (CN) Programs</p> <p>Administrative Reviews are conducted every one to five years for organizations participating in the National School Lunch Program, Child and Adult Care Food Program or the Summer Food Service Program. Review areas include resource management, civil rights, eligibility, verification, training, monitoring, meal counting and claiming, meal components and quantities among other areas.</p>	132	766
<p>Annual Fiscal Filing</p> <p>The school district shall file an annual report with the director of the department of education on forms prepared for that purpose. (Iowa Code § 291.10)</p>	325	4
<p>Authorized Expenditures</p> <p>The authorized expenditures of a school district during a base year shall not exceed the combined district cost for that year,</p>	325	2

Monitoring Review	Number Reviewed	Number of Noncompliance Items
the actual miscellaneous income received for that year, and the actual unspent balance from the preceding year. (Iowa Code §257.7)		
<p>Career and Technical Education Act for the 21st Century (Perkins V)</p> <p>The Bureau of Career & Technical Education is required to monitor Perkins recipients to ensure compliance with fiscal and management requirements of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) and applicable federal and state legislation, rules, regulations, and policy. In addition, the monitoring review provides an opportunity to meet compliance requirements, provide technical assistance, and foster continuous improvement.</p>	16	16

One school district met Iowa Code section 256.11(10)(a)(4). This code section states,

“The department shall provide a written report annually to the state board of any monitoring review resulting in multiple or substantial findings of noncompliance or noncompliance findings that remain uncorrected for more than thirty days past the deadline set by the department for correction.”

The district that were not able to fix the noncompliance items included:

1. River Valley CSD did not offer and teach physics in 21-22, 22-23 and 23-24. Physics may be taught in alternating years. The school district is planning to alternate Chemistry and Physics.

The Department will continue to work with this district.

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
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Monitoring Review Noncompliance and Corrective Actions 2022-2023 School Year

Monitoring Reviews Completed

The department monitors the following components for district and state accredited public and nonpublic schools. The following monitoring review information was retrieved from the department Consolidated Accountability and Support Application (CASA) for the 2022-2023 school year and from other monitoring systems.

Monitoring Review	Number Reviewed	Number of Noncompliance Items
<p>Preschool</p> <p>Information is collected for all Statewide Voluntary Preschool Programs, Shared Visions Preschool Programs implementing IQPPS, and all early childhood sessions serving one or more students with an individualized education program (IEP) so that the State can issue session ID numbers, which are used for Student Reporting in Iowa (SRI) to ensure compliance with requirements under Iowa Code 256C.3(4)c, IAC 281-16.13, and IAC 281-64.15.</p>	327	0
<p>K-12 Public Accreditation Desk Audit</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of local education agencies (LEAs). Accreditation monitoring requires a comprehensive desk audit of all accredited LEAs. Iowa Code 256.11(10)(a)(1)</p>	327	95
<p>K-12 Nonpublic State Accreditation Desk Audit</p> <p>The purpose of the desk audit is to provide a process for the continued accreditation of state-accredited nonpublic schools. Accreditation monitoring requires a comprehensive desk audit of all state-accredited nonpublic schools. Iowa Code § 256.11(10)(a)(1)</p>	114	1
<p>Focused Equity Review</p> <p>The purpose of the focused equity review is to ensure school districts meet federal civil rights laws. Laws include:</p> <ul style="list-style-type: none"> • Title VI of 1964 Civil Rights Act (race, color and national origin equity) • Title IX of the Educational Amendments of 1972 (sex equity) • Section 504 of the Rehabilitation Act of 1973 (disability equity) • Americans with Disabilities Act (ADA) of 1990 (disability equity) 	10	59
IDEA Part B Desk Audit	327	0

Monitoring Review	Number Reviewed	Number of Noncompliance Items
<p>The Part B Desk Audit is an examination of district wide data for students with disabilities ages 3-21. Historically, these data were used for Part B determinations of successful implementation of IDEA Part B. The department will continue to make determinations, required by section 616 of the Individuals with Disabilities Education Act (IDEA), as an integrated piece of the differentiated accountability desk audit process. Performance and compliance data will be used to determine how successfully a district is implementing IDEA Part B and the level of support to which the district will be assigned.</p>		
<p>Intensive Preschool Desk Audit The purpose of the desk audit is to provide a process for the continued accreditation of schools and school districts. Accreditation monitoring requires a comprehensive desk audit of all accredited schools and school districts. Iowa Code 256.11(10)(a)(1) The monitoring system shall ensure that programs meet the provisions herein requiring a properly licensed teacher and adoption of program standards. IAC 281—16.14</p>	1	0
<p>Preschool Desk Audit, Evidence of IQPPS Implementation The purpose of the desk audit is to provide a process for the continued accreditation of schools and school districts. Accreditation monitoring requires a comprehensive desk audit of all accredited preschool programs. Iowa Code 256.11(10)(a)(1)</p>	293	3
<p>USDA Child Nutrition (CN) Programs Administrative Reviews are conducted everyone to five years for organizations participating in the National School Lunch Program, Child and Adult Care Food Program or the Summer Food Service Program. Review areas include resource management, civil rights, eligibility, verification, training, monitoring, meal counting and claiming, meal components and quantities among other areas.</p>	11	54
<p>Annual Fiscal Filing The school district shall file an annual report with the director of the department of education on forms prepared for that purpose. (Iowa Code § 291.10)</p>	336	4
<p>Authorized Expenditures The authorized expenditures of a school district during a base year shall not exceed the combined district cost for that year, the actual miscellaneous income received for that year, and the actual unspent balance from the preceding year. (Iowa Code §257.7)</p>	327	3

Monitoring Review	Number Reviewed	Number of Noncompliance Items
<p>Career and Technical Education Act for the 21st Century (Perkins V)</p> <p>The Bureau of Career & Technical Education is required to monitor Perkins recipients to ensure compliance with fiscal and management requirements of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) and applicable federal and state legislation, rules, regulations, and policy. In addition, the monitoring review provides an opportunity to meet compliance requirements, provide technical assistance, and foster continuous improvement.</p>	25	16

Two school districts met Iowa Code section 256.11(10)(a)(4). This code section states,

“The department shall provide a written report annually to the state board of any monitoring review resulting in multiple or substantial findings of noncompliance or noncompliance findings that remain uncorrected for more than thirty days past the deadline set by the department for correction.”

The districts that were not able to fix the noncompliance items included:

1. Janesville was short one unit of math in grades 9-12. The school district is reviewing its current math courses and sharing opportunities.
2. BCLUW CSD was not able to hire a certified librarian. The school district did have an applicant consider but turned down the position. They also reached out to neighboring school districts to inquire about sharing their librarian but were not successful. The school district has updated its advertisements for the position to encourage those that may have worked as a public/community librarian to apply.

The Department will continue to work with these districts.

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
AGWSR	SFY 2023	Financial	Lisa Nolting	CACFP	Closed
AGWSR	SFY 2023	Training	Lisa Nolting	CACFP	Closed
AGWSR	SFY 2023	Civil Rights	Lisa Nolting	CACFP	Closed
AGWSR	SFY 2023	Required Policies	Lisa Nolting	CACFP	Closed
AGWSR	SFY 2023	Menus and Food Production Records (x 2)	Lisa Nolting	CACFP	Closed
Andrew	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Ames	09/15/2023	281—IAC 12.3(2) Policy Review	Eric Heitz	Accreditation	Closed
Ames	09/15/2023	Board Policy Review	Eric Heitz	Accreditation	Closed
Ames	09/15/2023	Offer and Teach: Short Health	Eric Heitz	Accreditation	Closed
Ames	09/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Ballard	09/15/2023	Offer and Teach: Short Health	Eric Heitz	Accreditation	Closed
BCLUW	09/15/2023	281—IAC 12.3(12)(a) No Certified Teacher Librarian on staff	Buffy Campbell	Accreditation	Closed- Uncorrected
Belmond-Klemme	09/15/2023	Offer and Teach: Short English Language Arts	Buffy Campbell	Accreditation	Closed
Bettendorf	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Boyden-Hull	08/15/2023	Offer and Teach: Short in Health	Pam Spangler	Accreditation	Closed
Brooklyn-Guernsey-Malcom	09/15/2023	Offer and Teach: short Physics - didn't offer in two-year cycle	Buffy Campbell	Accreditation	Closed
Burlington	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
CAM	9/15/2023	Late filing of fiscal reports - Certified Annual Report (CAR) and Special Education Supplement (SES)	Stephanie Edler	Annual Fiscal Filing	District will be presenting a corrective action plan to the School Budget Review Committee on December 12, 2023
Camanche	6/30/2023	Incurred Negative Unspent Balance	Stephanie Edler	Authorized Expenditures	District will be presenting a corrective action plan to the School Budget

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
					Review Committee on December 12, 2023
Camanche	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Cardinal	01/03/2024	Written Plan	SueAnn Johnson	Equity	In Progress
Cardinal	01/03/2024	Parking	SueAnn Johnson	Equity	In Progress
Cardinal	01/03/2024	Passenger Loading Zones	SueAnn Johnson	Equity	In Progress
Cardinal	01/03/2024	Toilet Rooms	SueAnn Johnson	Equity	In Progress
Cardinal	01/03/2024	Shower Rooms	SueAnn Johnson	Equity	In Progress
Cardinal	01/03/2024	Entrances	SueAnn Johnson	Equity	In Progress
Cedar Rapids	09/15/2023	Offer and Teach: Short Health	Marietta Rives	Accreditation	Closed
Cedar Rapids	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Centerville	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Central DeWitt	6/30/2023	Incurring Negative Unspent Balance		Authorized Expenditures	District will be presenting a corrective action plan to the School Budget Review Committee on December 12, 2023
Chariton	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Charles City	09/15/2023	Offer and Teach: Short Mathematics	Buffy Campbell	Accreditation	Closed
Charles City	12/31/2023	Written Plan	SueAnn Johnson	Equity	Further Action Required
Charles City	11/15/2023	Parking	SueAnn Johnson	Equity	Closed
Charles City	11/15/2023	Passenger Loading Zones	SueAnn Johnson	Equity	Closed
Charles City	11/15/2023	Entrances	SueAnn Johnson	Equity	Closed
Charles City	08/30/2024	Rooms and Spaces	SueAnn Johnson	Equity	Further Action Required
Charles City	11/15/2023	Toilet Rooms	SueAnn Johnson	Equity	Closed
Charles City	11/15/2023	Shower Rooms	SueAnn Johnson	Equity	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
Charles City	12/31/2023	Services for Students with Disabilities: Section 504 - no 504 Handbook	Dennis McClain	Equity	Closed
Clarinda	09/15/2023	Offer and Teach: Short Health	Janet Boyd	Accreditation	Closed
Clarksville	09/15/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
Clarksville	09/15/2023	No waiver on file to combine year 3/4 of World Language	Buffy Campbell	Accreditation	Closed
College	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Community Christian	SFY 2023	Income Applications (x 2)	Contracted - CN Resources	CACFP	Closed
Community Christian	SFY 2023	Financial	Contracted - CN Resources	CACFP	Closed
Community Christian	SFY 2023	Claim Verification (x 2)	Contracted - CN Resources	CACFP	Closed
Community Christian	SFY 2023	Civil Rights	Contracted - CN Resources	CACFP	Closed
Community Christian	SFY 2023	Enrollment	Contracted - CN Resources	CACFP	Closed
Community Christian	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
Corning	SFY 2023	Income Applications	Contracted - CN Resources	CACFP	Closed
Corning	SFY 2023	Monitoring of Facilities	Contracted - CN Resources	CACFP	Closed
Corning	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
Corning	SFY 2023	Claim Verification (x 2)	Contracted - CN Resources	CACFP	Closed
Danville	09/01/2023	Short 1.5 units in Social Studies for offer-and-teach	Sara Nickel	Accreditation	Closed
Diagonal	09/15/2023	Offer and Teach: Short CTE	Janet Boyd	Accreditation	Closed
Dunkerton	09/15/2023	Physics not offered and taught every other year	Buffy Campbell	Accreditation	Closed
Boyer Valley	09/15/2023	Offer and Teach: Short English Language Arts	Janet Boyd	Accreditation	Closed
Eagle Grove	08/15/2023	Offer and Teach: Short in Math	Pam Spangler	Accreditation	Closed
Easton Valley	09/15/2023	Offer and Teach: Short Social Studies	Eric Heitz	Accreditation	Closed
East Union	09/15/2023	Offer and Teach: Short Mathematics	Janet Boyd	Accreditation	Closed
East Union	09/15/2023	Offer and Teach: Short Science (Physics/Chemistry)	Janet Boyd	Accreditation	Closed
East Union	SFY 2023	Income Applications	Patricia Austin	CACFP	Closed
East Union	SFY 2023	Financial (x 2)	Patricia Austin	CACFP	Closed
East Union	SFY 2023	Training and Monitoring	Patricia Austin	CACFP	Closed
East Union	SFY 2023	Civil Rights	Patricia Austin	CACFP	Closed
East Union	SFY 2023	Enrollment	Patricia Austin	CACFP	Closed
East Union	SFY 2023	Menus and Food Production Records (x 2)	Patricia Austin	CACFP	Closed
River Valley	08/15/2023	Offer and Teach: Short World Languages	Pam Spangler	Accreditation	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
River Valley	08/15/2023	Offer and Teach: Short in Social Studies	Pam Spangler	Accreditation	Closed
Emmetsburg	08/15/2023	Offer and Teach: Shortage in Science	Pam Spangler	Accreditation	Closed
Estherville Lincoln Central	08/15/2023	Offer and Teach: Short Social Studies	Pam Spangler	Accreditation	Closed
Forest City	09/15/2023	Physics not offered in two-year cycle	Buffy Campbell	Accreditation	Closed
Fremont-Mills	10/02/2023	Offer and Teach: Short World Language	Janet Boyd	Accreditation	Closed
George-Little Rock	10/16/2023	Appointment of Equity Coordinator	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Attendance center and course enrollment data	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Second language scholarship information	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Missing notice of nondiscrimination	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Documentation of Employment Practices	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Adding a complete nondiscrimination notice	Pam Spangler	Equity	Closed
George-Little Rock	10/16/2023	Counseling of Students with Limited English-Speaking Ability or Hearing Impairments	Pam Spangler	Equity	Closed
Gilbert	09/15/2023	Board Policy Review	Eric Heitz	Accreditation	Closed
Gilbert	09/15/2023	Board Policy Review	Eric Heitz	Accreditation	Closed
Gilbert	09/15/2023	Board Policy Review	Eric Heitz	Accreditation	Closed
Gilbert	09/15/2023	Board Policy Review	Eric Heitz	Accreditation	Closed
Gilbert	09/15/2023	Offer and Teach: Short English Language Arts	Eric Heitz	Accreditation	Closed
Glenwood	10/10/2023	Toilet Rooms	SueAnn Johnson	Equity	Closed
Glidden- Ralston	11/03/2023	Written Plan	SueAnn Johnson	Equity	Closed
Glidden- Ralston	12/31/2023	Cafeteria	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	08/01/2024	Parking	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	08/01/2024	Passenger Loading Zone	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	08/01/2024	Ramps	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	12/31/2023	Entrances	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	08/01/2024	Rooms and Spaces	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	12/31/2023	Toilet Rooms	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	12/31/2023	Shower Rooms	SueAnn Johnson	Equity	In Progress
Glidden- Ralston	12/31/2023	Library	SueAnn Johnson	Equity	In Progress
Graettinger- Terriil	08/15/2023	Offer and Teach: Short in Math	Pam Spangler	Accreditation	Closed
Greene County	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-	Jeffrey Fletcher	Federal Perkins V	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
		awards to ensure sub-recipients have met the audit requirements in Section 74.26.			
Green Valley	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Grundy Center	09/15/2023	Physics not taught in two-year cycle	Buffy Campbell	Accreditation	Closed
H-L-V	09/15/2023	Offer and Teach: Short Mathematics	Marietta Rives	Accreditation	Closed
H-L-V	09/15/2023	Offer and Teach: Computer Science	Marietta Rives	Accreditation	Closed
Hartley-Melvin-Sanborn	08/15/2023	Offer and Teach: Short Health	Pam Spangler	Accreditation	Closed
Hinton	08/15/2023	Junior High: Health must be taught in grades 7 and 8	Pam Spangler	Accreditation	Closed
Hinton	08/15/2023	Offer and Teach: Health shortage	Pam Spangler	Accreditation	Closed
Hinton	08/15/2023	Offer and Teach: Short Math	Pam Spangler	Accreditation	Closed
Hinton	SFY 2023	Enrollment (x 2)	Contracted - CN Resources	CACFP	Closed
Hinton	SFY 2023	Menus and Food Production Records (x 3)	Contracted - CN Resources	CACFP	Closed
Independence	09/15/2023	Offer and Teach: Short English Language Arts	Buffy Campbell	Accreditation	Closed
Interstate 35	09/15/2023	Offer and Teach: Short English Language Arts	Eric Heitz	Accreditation	Closed
Interstate 35	09/15/2023	Offer and Teach: Short Social Studies	Eric Heitz	Accreditation	Closed
Interstate 35	09/15/2023	Offer and Teach: Short Mathematics	Eric Heitz	Accreditation	Closed
Iowa City	6/30/2023	Incurred Negative Unspent Balance	Stephanie Edler	Authorized Expenditures	District will be presenting a corrective action plan to the School Budget Review Committee on December 12, 2023
Iowa City	9/15/2023	Late filing of fiscal reports - Certified Annual Report (CAR), Special Education Supplement (SES), and Annual Transportation Report (ATR)	Stephanie Edler	Annual Fiscal Filing	District will be presenting a corrective action plan to the School Budget Review Committee on December 12, 2023
Janesville	09/15/2023	Offer and Teach: Short English Language Arts	Buffy Campbell	Accreditation	Closed
Janesville	09/15/2023	Offer and Teach: Short Mathematics	Buffy Campbell	Accreditation	Closed – Uncorrected
Janesville	09/15/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
Janesville	09/15/2023	Equity Notifications: Annual Notice	Buffy Campbell	Accreditation	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
Janesville	09/15/2023	Elementary Program: Art, Music, PE, Health	Buffy Campbell	Accreditation	Further Action Required
Janesville	09/15/2023	Middle School Program: Health	Buffy Campbell	Accreditation	Closed
Greene County	08/15/2023	Offer and Teach: Short in Math	Pam Spangler	Accreditation	Closed
Lamoni	10/02/2023	Offer and Teach: Short English Language Arts	Janet Boyd	Accreditation	Closed
Lone Tree	09/15/2023	Offer and Teach: Short English Language Arts	Marietta Rives	Accreditation	Closed
Lone Tree	09/15/2023	Offer and Teach: Short Social Studies	Marietta Rives	Accreditation	Closed
Lone Tree	09/15/2023	Offer and Teach: Short Science	Marietta Rives	Accreditation	Closed
Lone Tree	09/15/2023	Offer and Teach: Short Health	Marietta Rives	Accreditation	Closed
Maquoketa	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Manson Northwest Webster	08/15/2023	Offer and Teach: Short in World Languages	Pam Spangler	Accreditation	Closed
Melcher-Dallas	09/15/2023	Offer and Teach: Short Mathematics	Eric Heitz	Accreditation	Closed
Missouri Valley	09/15/2023	Offer and Teach: Short Mathematics	Janet Boyd	Accreditation	Closed
Mormon Trail	09/15/2023	Offer and Teach: Short Mathematics	Janet Boyd	Accreditation	Closed
Mormon Trail	10/02/2023	Offer and Teach: Computer Science	Janet Boyd	Accreditation	Closed
Mormon Trail	09/15/2023	Offer and Teach: Short Science	Janet Boyd	Accreditation	Closed
Murray	09/15/2023	Offer and Teach: Short Social Studies	Janet Boyd	Accreditation	Closed
Nashua-Plainfield	09/15/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
New London	09/15/2023	Short .5 unit in English Language Arts for offer-and-teach	Sara Nickel	Accreditation	Closed
Northeast	09/15/2023	Offer and Teach: Short Mathematics	Eric Heitz	Accreditation	Closed
Northeast	09/15/2023	Offer and Teach: Short English Language Arts	Eric Heitz	Accreditation	Closed
North Cedar	SFY 2023	Income Applications (x 2)	Sandra Fiegen	CACFP	Closed
North Cedar	SFY 2023	Financial	Sandra Fiegen	CACFP	Closed
North Cedar	SFY 2023	Civil Rights	Sandra Fiegen	CACFP	Closed
North Cedar	SFY 2023	Edit Checks	Sandra Fiegen	CACFP	Closed
North Cedar	SFY 2023	Infant Meal Observation	Sandra Fiegen	CACFP	Closed
North Scott	SFY 2023	Financial	Sandra Fiegen	CACFP	Closed
North Scott	SFY 2023	Civil Rights	Sandra Fiegen	CACFP	Closed
North Scott	SFY 2023	Menus and Food Production Records	Sandra Fiegen	CACFP	Closed
Norwalk	09/15/2023	Item 8: Daily Schedule	Mary Breyfogle	Accreditation	Closed
Oelwein	09/27/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
Orient-Macksburg	09/15/2023	Offer and Teach: Short Science	Janet Boyd	Accreditation	Closed
Paton-Churdan	08/15/2023	Offer and Teach: Short in World Languages	Pam Spangler	Accreditation	Closed
PCM	9/15/2023	Late filing of fiscal reports - Certified Annual Report (CAR), Special Education Supplement	Stephanie Edler	Annual Fiscal Filing	District will be presenting a

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
		(SES), and Annual Transportation Report (ATR)			corrective action plan to the School Budget Review Committee on December 12, 2023
Pekin	09/22/2023	Short 1.5 units in mathematics for offer-and-teach	Sara Nickel	Accreditation	Closed
Perry	09/15/2023	Offer and Teach: Short Social Studies	Eric Heitz	Accreditation	Closed
Perry	09/15/2023	Offer and Teach: Short Physical Education	Eric Heitz	Accreditation	Closed
Perry	09/15/2023	Offer and Teach: Computer Science	Eric Heitz	Accreditation	Closed
Perry	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Postville	09/15/2023	Services for Students with Disabilities: Section 504 - no 504 Handbook	Buffy Campbell	Equity	Closed
Postville	12/31/2023	Written Plan	SueAnn Johnson	Equity	Further Action Required
Postville	12/31/2023	Parking	SueAnn Johnson	Equity	In Progress
Postville	12/31/2023	Toilet Rooms	SueAnn Johnson	Equity	Further Action Required
Postville	12/31/2023	Shower Rooms	SueAnn Johnson	Equity	Further Action Required
Postville	12/31/2023	Entrances	SueAnn Johnson	Equity	Closed
Remsen-Union - St Marys High School	08/15/2023	Offer and Teach: Short in English Language Arts	Pam Spangler	Accreditation	Closed
Riceville	09/15/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
Riceville	09/15/2023	Offer and Teach: Short Mathematics	Buffy Campbell	Accreditation	Closed
Riceville	09/15/2023	Offer and Teach: Short English Language Arts	Buffy Campbell	Accreditation	Closed
Royal Legacy Christian Academy	SFY 2023	Income Applications	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Financial	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Records Maintenance	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Training and Monitoring	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Claim Verification	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Civil Rights	Sandra Fiegen	CACFP	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
Royal Legacy Christian Academy	SFY 2023	Enrollment	Sandra Fiegen	CACFP	Closed
Royal Legacy Christian Academy	SFY 2023	Menus and Food Production Records (x 2)	Sandra Fiegen	CACFP	Closed
Rudd-Rockford-Marble Rock	09/15/2023	Offer and Teach: Short Social Studies	Buffy Campbell	Accreditation	Closed
Ruthven-Ayrshire	08/15/2023	Offer and Teach: Short in Math (four sequential units)	Pam Spangler	Accreditation	Closed
St Matthew	SFY 2023	Income Applications	Contracted - CN Resources	CACFP	Closed
St Matthew	SFY 2023	Claim Verification	Contracted - CN Resources	CACFP	Closed
St Matthew	SFY 2023	Civil Rights	Contracted - CN Resources	CACFP	Closed
St Matthew	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
St Matthew	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
St Matthew	SFY 2023	Meal Observation (x 2)	Contracted - CN Resources	CACFP	Closed
St Pius X - Cedar Rapids	SFY 2023	Claim Verification	Lisa Robinson	CACFP	Closed
St Pius X - Cedar Rapids	SFY 2023	Meal Observation	Lisa Robinson	CACFP	Closed
Schaller-Crestland	SFY 2023	Income Applications (x 2)	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Financial (x3)	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Enrollment	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Menus and Food Production Records (x 5)	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Menus and Food Production Records (x 2)	Contracted - CN Resources	CACFP	Closed
Schaller-Crestland	SFY 2023	Meal Observation	Contracted - CN Resources	CACFP	Closed
Sibley-Ocheyedan	08/15/2023	Offer and Teach: Short in World Languages	Pam Spangler	Accreditation	Closed
Southeast Polk	9/15/2023	Late filing of fiscal report - Certified Annual Report (CAR)		Annual Fiscal Filing	District will be presenting a corrective action plan to the School Budget Review Committee on December 12, 2023
South Page	09/15/2023	Offer and Teach: Short English Language Arts	Janet Boyd	Accreditation	Closed
South Page	09/15/2023	Offer and Teach: Short Science	Janet Boyd	Accreditation	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
South Tama County	09/15/2023	Item 9: Partnering with Families	Mary Breyfogle	Accreditation	Ready for Review
Spencer	08/15/2023	Offer and Teach: Short in Health	Pam Spangler	Accreditation	Closed
Spencer	09/15/2023	Item 8: Daily Schedule	Mary Breyfogle	Accreditation	Closed
Spirit Lake	10/20/2023	Missing 'age' from protected classes	Pam Spangler	Equity	Closed
Spirit Lake	08/01/2024	Entrances and Exits	SueAnn Johnson	Equity	In Progress
Spirit Lake	10/20/2023	Changes to High School Handbook	Pam Spangler	Equity	Closed
Spirit Lake	10/20/2023	Scholarship application missing the notice of nondiscrimination	Pam Spangler	Equity	Closed
Spirit Lake	10/20/2023	Missing EEO notice with completed contact information	Pam Spangler	Equity	Closed
Spirit Lake	12/01/2023	Written Plan	SueAnn Johnson	Equity	Closed
Spirit Lake	11/01/2023	Parking	SueAnn Johnson	Equity	Action Overdue
Spirit Lake	12/21/2023	Signage	SueAnn Johnson	Equity	In Progress
Spirit Lake	08/01/2024	Restrooms	SueAnn Johnson	Equity	In Progress
Spirit Lake	08/01/2024	Locker Rooms	SueAnn Johnson	Equity	In Progress
Storm Lake	09/15/2023	Appointment of Equity Coordinator	Pam Spangler	Equity	Closed
Storm Lake	09/15/2023	Employment Practices	Pam Spangler	Equity	Closed
Storm Lake	09/15/2023	Written Plan for Facilities	SueAnn Johnson	Equity	Closed
Storm Lake	10/06/2023	Parking	SueAnn Johnson	Equity	Closed
Storm Lake	10/06/2023	Passenger Loading Zones	SueAnn Johnson	Equity	Closed
Storm Lake	09/15/2023	Rooms and Spaces	SueAnn Johnson	Equity	Closed
Storm Lake	01/02/2024	Restrooms	SueAnn Johnson	Equity	Closed
Storm Lake	09/30/2023	Shower Rooms	SueAnn Johnson	Equity	Closed
Storm Lake	01/02/2024	Assembly Areas	SueAnn Johnson	Equity	In Progress
Storm Lake	09/15/2023	Cafeteria	SueAnn Johnson	Equity	Closed
Tipton	09/15/2023	Offer and Teach: Short Health	Marietta Rives	Accreditation	Closed
Tri-Center	09/15/2023	Offer and Teach: Short English Language Arts	Janet Boyd	Accreditation	Closed
Tripoli	09/15/2023	Offer and Teach: Short CTE	Buffy Campbell	Accreditation	Closed
Turkey Valley	09/15/2023	Offer and Teach: Short Mathematics	Buffy Campbell	Accreditation	Closed
Urbandale	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Van Buren County	09/15/2023	Short 1.5 units in English Language Arts for offer-and-teach	Sara Nickel	Accreditation	Closed
Waco	09/15/2023	Short 1 unit in Science for offer-and-teach	Sara Nickel	Accreditation	Closed
Wapello	11/15/2023	Appointment of Equity Coordinator	Sara Nickel	Equity	Closed
Waterloo	09/15/2023	Board Policy Review	Buffy Campbell	Accreditation	Closed
West Harrison	09/15/2023	Offer and Teach: Short English Language Arts	Janet Boyd	Accreditation	Closed
West Sioux	08/15/2023	Offer and Teach: Short in English Language Arts	Pam Spangler	Accreditation	Closed

Agency Name	Date Required	Issue	Oversight Assignment	Program Area	Status
Western	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed
Western Dubuque	11/15/2023	The Education Department General Administrative Regulations (EDGAR) Section 74.51 states, "recipients shall monitor sub-awards to ensure sub-recipients have met the audit requirements in Section 74.26.	Jeffrey Fletcher	Federal Perkins V	Closed

Methods of Administration Program Review of Selected Subrecipients

During the 2022-23 and 2023-24 reporting cycles, the Iowa Department of Education reviewed twenty-two subrecipients, including twenty LEAs and two community colleges, to determine compliance with federal civil rights laws to ensure that all students have equal access to high-quality CTE programs. As part of Iowa's commitment to ensure equity in education, the Department's review included a desk audit of selected subrecipient district policies and procedures and an on-site accessibility visit to determine physical accessibility. The Department's review process is set out in the 2020 MOA State Plan. Specifically, the Department sought to determine each selected subrecipient district's compliance with the *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (Guidelines) and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, prohibiting discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, prohibiting discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, prohibiting discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, prohibiting discrimination on the basis of disability.

2022-23 LEAs

LEA	Selection Letter Sent	Letter of Findings (LOF) Sent	Number of Corrective Actions	Voluntary Compliance Plan (VCP) Received	Date Closed
Cardinal CSD	4/6/23	9/18/23	6	10/11/23	4/26/24
Charles City CSD	4/6/23	9/25/23	8	10/2/23	12/2/24
George-Little Rock CSD	4/6/23	9/11/23	17	11/20/23	11/7/24
Glenwood CSD	4/6/23	9/25/23	5	10/10/23	1/10/24
Glidden-Ralston CSD	4/6/23	9/15/23	10	10/25/23	Monitoring - 3 items outstanding
Postville CSD	4/6/23	9/25/23	5	10/4/23	2/9/24
Spirit Lake CSD	4/6/23	9/11/23	10	10/17/23	9/4/24
Springville CSD	4/6/23	9/18/23	6	11/1/23	3/12/24
Storm Lake CSD	4/6/23	7/21/23	10	9/11/23	1/22/24
Wapello CSD	4/6/23	9/25/23	5	11/9/23	12/21/23

Cardinal Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Joel Pedersen, Superintendent
Cardinal Community School District
4045 Ashland Road
Eldon, IA 52554

Dear Superintendent Pedersen:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Cardinal Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Sara Nickel, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

Creating excellence in education through leadership and service

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Cardinal CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Cardinal CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 29.6 percent for CTE Concentrators.
- Indicator B: Cardinal CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 29.6 percent for CTE Concentrators.
- Indicator C: Cardinal CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 59.3 percent for CTE Concentrators.
- Indicator D: Cardinal CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 29.6 percent for CTE Concentrators.

If you have any questions, please contact Sara Nickel at 515-971-7558 or sara.nickel@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Sara Nickel, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:29 AM

Subject: Equity Review Letter and Desk Audit

To: joel.pedersen@cardinalcomet.com <joel.pedersen@cardinalcomet.com>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>, Sara Nickel <sara.nickel@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Pedersen:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 18, 2023

James Craig, Superintendent
Cardinal Community School District
4045 Ashland Road
Eldon, Iowa 52553Re: Iowa Department of Education Equity Review - Letter of Findings

Dear Superintendent Craig:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Cardinal Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because the Cardinal High School/Middle School is the only school in the school district that offers CTE programs, it is the only school in Cardinal CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Cardinal CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Cardinal CSD for an equity review are as follows:

Cardinal CSD Data:**Creating excellence in education through leadership and service**

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Cardinal CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Cardinal CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 29.6 percent for CTE Concentrators.
- Indicator B: Cardinal CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 29.6 percent for CTE Concentrators.
- Indicator C: Cardinal CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 59.3 percent for CTE Concentrators.
- Indicator D: Cardinal CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 29.6 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Cardinal CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar

year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Tim Albert, Cardinal CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Cardinal Community School District

Letter of Findings



September 18, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Cardinal CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Cardinal CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Cardinal CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Cardinal CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Cardinal CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Cardinal CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Cardinal Community School District's high school / middle school building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Cardinal High School / Middle School Building, 4045 Ashland Road, Eldon, Iowa 52554

Building / Additions	Construction Year	Applicable Review Standard
Original construction	MS/HS: 1959	Programs within facility must be readily accessible.
Addition & Renovation	HS Gym/LR: 1972 MS Addition: 2001	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the middle school/high school building during the visit. The district must submit a written plan describing how the noncompliance areas noted will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are made available to students, staff, parents, and community members with disabilities. The compliance issues include:

Van accessible parking stalls need to be identified with "Van Accessible" signs, and two more accessible parking stalls need to be added as per the notes below.

The Middle School and High School loading areas need to have the appropriate signage for accessible loading.

The Middle School and High School needs to address compliance issues within the toilet rooms and shower rooms, in regards to appropriate accessible and non-accessible signage, grab bars, and wrapping hot water pipes.

The main entrance needs to provide a lower button to access the video/speaker system which allows access to the building.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	The South lot currently has 52 parking stalls and needs 1 more accessible stall. The North lot currently has 125 parking stalls with 3 van accessible stalls. This lot needs 1 more accessible stall. All van accessible parking stalls need signage that indicated they are van accessible.	ADA Standard 4.1.2(5)(b), 4.6.5 4.6.4, 4.30.7	ADA Standard 4.1.2(5)(b), 4.6.5 4.6.4, 4.30.7
Passenger Loading Zones	Signage displaying international symbol of accessibility at the accessible loading zone at the MS and at the HS are needed.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Toilet Rooms	All MS and HS RRs need to have hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair. All RRs need the appropriate amount of grab bars in the accessible stalls. All RRs must be identified by signage for accessible restrooms (once the grab bars are installed and the pipes are wrapped). On the latch side of the door, and 60 inches above the floor.	ADA Standard 4.19.4 ADA Standard 4.17.6, 4.26 ADA Standard 4.1.6(3)(e); 4.30	ADA Standard 4.19.4 ADA Standard 4.17.6, 4.26 ADA Standard 4.1.6(3)(e), 4.30
Shower Rooms	MS LR: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On	ADA Standard 4.1.2(7)(d)	ADA Standard 4.1.2(7)(d)

	the latch side of the door, and 60 inches above the floor. HS LRs: are not accessible and need appropriate signage with an arrow (and potentially comments) pointing to the accessible MS LRs.	ADA Standard 4.1.2(7)(d)	ADA Standard 4.1.2(7)(d)
Entrances	Main entrance door buzzer/camera need to be lowered for accessibility.		

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Cardinal Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates school board policy 102.E3 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented strategies and school board policy 401.1, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Cardinal CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 18, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Cardinal Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School: Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Cardinal CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking – The South lot currently has 52 parking</p>	<p>The South lot needs 1 more accessible parking stall.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>stalls and needs 1 more accessible parking stall.</p> <p>The North lot currently has 125 parking stalls with 3 van accessible stalls. This lot needs 1 more accessible stall.</p> <p>All van accessible parking stalls need signage that indicated they are van accessible.</p>	<p>The North lot currently has 125 parking stalls with 3 van accessible stalls. This lot needs 1 more accessible stall.</p> <p>All van accessible parking stalls need signage that indicated they are van accessible.</p>			
<p>Passenger Loading Zones – Signage displaying international symbol of accessibility at the accessible loading zone at the MS and at the HS are lacking.</p>	<p>Signage displaying international symbol of accessibility at the accessible loading zone at the MS and at the HS are needed.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Toilet Rooms – All MS and HS RRs need to have hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>All RRs need the appropriate amount of grab bars in the accessible stalls.</p> <p>All RRs must be identified by signage for accessible restrooms (once the grab bars are installed and the</p>	<p>All MS and HS RRs need to have hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>All RRs need the appropriate amount of grab bars in the accessible stalls.</p> <p>All RRs must be identified by signage for accessible restrooms</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>pipes are wrapped). On the latch side of the door, and 60 inches above the floor.</p>	<p>(once the grab bars are installed and the pipes are wrapped). On the latch side of the door, and 60 inches above the floor.</p>			
<p>Shower Rooms – MS LRs: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>HS LRs: are not accessible and need appropriate signage with an arrow (and potentially comments) pointing to the accessible MS LRs.</p>	<p>MS LRs: need to be identified by international symbol of accessibility signs with brail on the latch side of the door, and 60 inches above the floor.</p> <p>HS LRs: are not accessible and need appropriate directional signage with an arrow (and potentially directions) pointing to the accessible MS LRs.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Entrances – Main entrance door buzzer/camera need to be lowered for accessibility.</p>	<p>Main entrance door buzzer/camera need to be lowered for accessibility.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date



September 18, 2023

Attachment A

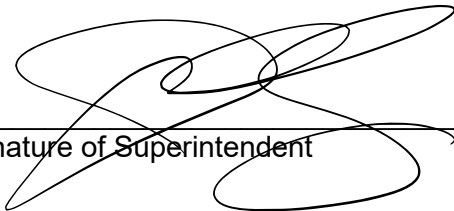
Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Cardinal Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School:</p> <p>Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Cardinal CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>	<p>James Craig Superintendent</p>	<p>January 3, 2024</p>
<p>Parking – The South lot currently has 52 parking</p>	<p>The South lot needs 1 more accessible parking stall.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Dustin LaRue Director of Maintenance</p>	<p>January 3, 2024</p>

<p>stalls and needs 1 more accessible parking stall.</p> <p>The North lot currently has 125 parking stalls with 3 van accessible stalls. This lot needs 1 more accessible stall.</p> <p>All van accessible parking stalls need signage that indicated they are van accessible.</p>	<p>The North lot currently has 125 parking stalls with 3 van accessible stalls. This lot needs 1 more accessible stall.</p> <p>All van accessible parking stalls need signage that indicated they are van accessible.</p>		<p>James Craig Superintendent</p>	
<p>Passenger Loading Zones – Signage displaying international symbol of accessibility at the accessible loading zone at the MS and at the HS are lacking.</p>	<p>Signage displaying international symbol of accessibility at the accessible loading zone at the MS and at the HS are needed.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Dustin LaRue Director of Maintenance</p> <p>James Craig Superintendent</p>	<p>January 3, 2024</p>
<p>Toilet Rooms – All MS and HS RRs need to have hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>All RRs need the appropriate amount of grab bars in the accessible stalls.</p> <p>All RRs must be identified by signage for accessible restrooms (once the grab bars are installed and the</p>	<p>All MS and HS RRs need to have hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>All RRs need the appropriate amount of grab bars in the accessible stalls.</p> <p>All RRs must be identified by signage for accessible restrooms</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Dustin LaRue Director of Maintenance</p> <p>James Craig Superintendent</p>	<p>January 3, 2024</p>

<p>pipes are wrapped). On the latch side of the door, and 60 inches above the floor.</p>	<p>(once the grab bars are installed and the pipes are wrapped). On the latch side of the door, and 60 inches above the floor.</p>			
<p>Shower Rooms – MS LRs: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>HS LRs: are not accessible and need appropriate signage with an arrow (and potentially comments) pointing to the accessible MS LRs.</p>	<p>MS LRs: need to be identified by international symbol of accessibility signs with brail on the latch side of the door, and 60 inches above the floor.</p> <p>HS LRs: are not accessible and need appropriate directional signage with an arrow (and potentially directions) pointing to the accessible MS LRs.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Dustin LaRue Director of Maintenance</p> <p>James Craig Superintendent</p>	<p>January 3, 2024</p>
<p>Entrances – Main entrance door buzzer/camera need to be lowered for accessibility.</p>	<p>Main entrance door buzzer/camera need to be lowered for accessibility.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Dustin LaRue Director of Maintenance</p> <p>James Craig Superintendent</p>	<p>January 3, 2024</p>



Signature of Superintendent

October 11, 2023

Date

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

February 5, 2024

James Craig, Superintendent
Cardinal Community School District
4045 Ashland Road
Eldon, Iowa 52553Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items

Dear Superintendent Craig:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows six items requiring Cardinal Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 18, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, February 23, 2024, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-0977-1 Written Plan
- 2324-0977-2 Parking
- 2324-0977-3 Passenger Loading Zones
- 2324-0977-4 Toilet Rooms
- 2324-0977-5 Shower Rooms
- 2324-0977-6 Entrances

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Craig at james.craig@cardinalcomet.com. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Creating excellence in education through leadership and service

Respectfully,

SueAnn D. Johnson

Administrative Consultant – Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Ph: (515) 336-3942
E: sueann.johnson@iowa.gov

cc: Cindy Green, Cardinal CSD Equity Coordinator
Tina Wahlert, Bureau Chief – School Improvement
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Feb 5, 2024 at 12:36 PM

Subject: MOA Equity Review - Noncompliance Items

To: James Craig <james.craig@cardinalcomet.com>

Cc: cindy.green@cardinalcomet.com <cindy.green@cardinalcomet.com>, Wahler, Tina <tina.wahler@iowa.gov>, Kimberly Buryanek <kim.buryanek@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Nickel, Sara <sara.nickel@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>

Dear Superintendent Craig:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows six items requiring Cardinal Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 18, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, February 23, 2024, as the previous deadlines have passed.

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Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Craig at james.craig@cardinalcomet.com. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

March 5, 2024

James Craig
Superintendent
Cardinal Community School District
4045 Ashland Road
Eldon, Iowa 52553

Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items – Step Two Letter

Dear Superintendent Craig,

This letter is in reference to previous correspondence to the Cardinal Community School District (CSD) from the Iowa Department of Education (Department), dated February 5, 2024 (see attached), outlining six outstanding corrective actions for areas of equity noncompliance at the Cardinal Community School District’s (CSD) middle and/or high school.

As of the date of this letter, the Department’s Consolidated Accountability and Support Application (CASA) corrective action dashboard shows four corrective actions remain outstanding and require your district’s immediate attention. These issues were originally brought to your attention in a Letter of Finding (LOF), dated September 18, 2023 (see attached), following an on-site equity review in spring 2023.

As you are already aware, it is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item immediately, as all previous deadlines and extensions have passed.

The current status of the following corrective actions in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-0977-1 Written Plan
- 2324-0977-3 Passenger Loading Zones
- 2324-0977-5 Shower Rooms
- 2324-0977-6 Entrances

The Department is unable to close the corrective actions until all requisite action steps outlined in CASA have been followed, including uploading photographic proof of completion. After all steps have been completed, update the status in CASA for each corrective action by clicking the

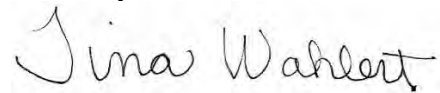
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"in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Craig at james.craig@cardinalcomet.com. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,



Tina Wahlert

Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: 515-326-0162
Email: Tina.Wahlert@iowa.gov

cc: Tim Albert, Cardinal CSD School Board President
Andy Noe, Cardinal CSD School Board Vice President
Trevor Brown, Cardinal CSD School Board Member
Ryan Johnson, Cardinal CSD School Board Member
Debb Kent, Cardinal CSD School Board Member
Cindy Green, Cardinal CSD Equity Coordinator
SueAnn Johnson, Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Charles City Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Anne Lundquist, Superintendent
Charles City Community School District
1204 1st Avenue
Charles City, IA 50616

Dear Superintendent Lundquist:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Charles City Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Buffy Campbell, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you this summer by Bill Roederer, Consultant, Bureau of School Business Operations at 515-515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

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School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts with secondary vocational education programs are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Charles City CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Charles City CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 26.9 percent for CTE Concentrators.
- Indicator B: Charles City CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 29.1 percent for CTE Concentrators.
- Indicator C: Charles City CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 55.9 percent for CTE Concentrators.
- Indicator D: Charles City CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.9 percent for CTE Concentrators.

If you have any questions, please contact Buffy Campbell at 515-954-8651 or buffy.campbell@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Buffy Campbell, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:35 AM

Subject: Equity Review Letter and Desk Audit

To: alundqu@charles-city.k12.ia.us <alundqu@charles-city.k12.ia.us>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Buffy Campbell <buffy.campbell@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Lundquist:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 25, 2023

Dr. Anne Lundquist
Superintendent
Charles City Community School District
1204 1st Avenue
Charles City, Iowa 50616Re: Iowa Department of Education Equity Review – Letter of Findings

Dear Superintendent Lundquist:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Charles City Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Charles City High School is the only school in the school district that offers CTE programs, it is the only school in Charles City CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Charles City CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Charles City CSD for an equity review are as follows:

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Charles City CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Charles City CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Charles City CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 26.9 percent for CTE Concentrators.
- Indicator B: Charles City CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 29.1 percent for CTE Concentrators.
- Indicator C: Charles City CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 55.98 percent for CTE Concentrators.
- Indicator D: Charles City CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.99 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Charles City CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights

requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,

Tina Wahlert, Chief
Bureau of School Improvement

cc: Pat Rottinghaus, Charles City CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Buffy Campbell, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Charles City Community School District

Letter of Findings



September 25, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Charles City CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Recommendations:

- CTE Service areas are listed using old area names. Please update the CTE service areas offered by the district, using the current group titles.
[CTE landing page, Iowa Department of Education](#)
(See bulleted list of service areas for new group names)

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Charles City CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Charles City CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Charles City CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Charles City CSD School Board policy number 102, 102E1(Annual notice), and 102E3 (Continual Notice) includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Charles City CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills. These include native language speakers for translation, and sign language interpreters as needed.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments. Review of documents provided by the district indicate that the district uses native language speakers and is able to provide sign language interpreters when needed.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Charles City Community School District’s high school and middle school buildings were reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Charles City, High School Building, 1 Comet Drive, Charles City, Iowa 50616
Charles City, Middle School Building, 1200 1st Ave., Charles City, Iowa 50616

Building / Additions	Construction Year	Applicable Review Standard
Original construction	HS: 1961 MS: 2016	Programs within facility must be readily accessible.
Additions	HS Addition: 1973 (front entrance)	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the high school and middle school buildings during the visit. The district must submit a written plan describing how the noncompliance areas noted will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are made available to students, staff, parents, and community members with disabilities. The compliance issues include:

Additional Handicap Accessible parking stalls, and Van Accessible parking stalls are needed.

The school loading area needs to have the appropriate signage for accessible loading.

The school needs to address compliance issues within the toilet rooms and shower rooms, in regards to appropriate accessible and non-accessible signage.

The school needs to address compliance issues in regards to appropriate accessibility and non-accessibility entrances and doors around the building.

Throughout the HS the district needs to address round door knobs that are not accessible.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will

be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	The HS South lot currently has 188 parking stalls with 0 accessible stalls, and 0 van accessible stalls. This lot needs 8 total accessible stalls, with at least 1 stall being van accessible. The MS North lot currently has 54 parking stalls with 2 van accessible stalls. This lot needs 1 additional accessible stall.	ADA Standard 4.1.2(5)(b), 4.6.5	ADA Standard 4.1.2(5)(b), 4.6.5
Passenger Loading Zones	Signage displaying international symbol of accessibility at the accessible loading zone is needed at the HS and the MS loading zone areas.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Toilet Rooms	All HS rest rooms (except Crossroads RRs) are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor. HS Crossroads rest rooms need an accessible sign. On the latch side of the door, and 60 inches above the floor.	ADA Standard 4.1.6(3)(e); 4.30 ADA Standard 4.1.2(7)(d)	ADA Standard 4.1.6(3)(e), 4.30 ADA Standard 4.1.2(7)(d)
Shower Rooms	Old HS Gym locker rooms: is not an accessible shower room and needs to be	ADA Standard	ADA Standard 4.1.2(7)(d)

	identified by international symbol of accessibility signs with Braille, and an arrow pointing to the accessible locker room. On the latch side of the door, and 60 inches above the floor.	4.1.2(7)(d)	
Entrances	HS Door #1 and MS Door #4: Needs to be identified by the international symbol of accessibility. HS Doors #3, 12, 19/22, 23, 25 – 31, 33, and 34, and MS Doors #3 and 10: Need signs indicating the nearest accessible entrance with arrows.	ADA Standard 4.1.2(7)(c), 4.30 ADA Standard 4.1.3(8)(d), 4.30	ADA Standard 4.1.2(7)(c), 4.30 ADA Standard 4.1.3(8)(d), 4.30
Rooms and Spaces	Due to round door knobs, some room doors are non-compliant due to: *Ability to open doors without too much force. *Doors are not operable without tight grasping, pinching, or twisting of the wrist.	ADA Standards 4.13.11 4.13.9	ADA Standards 4.13.11 4.13.9

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Charles City Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates school board policy 102.E3 (Section 504) is up to date. However, the district does not have a handbook or forms which operationalize the policy to ensure services for students with disabilities are receiving an equitable education.

Recommendations:

- The district should consider contacting Dr. Bill Soesbe, Central Rivers AEA Section 504 contact, for support in creating a district Section 504 manual. Assistant Chief Karl Kurt is the contact for facilities. [Central Rivers AEA Section 504](#)

Required Corrective Action(s):

- Charles City CSD will develop, review and implement a handbook and policy to operationalize Section 504, in alignment with ADA requirements and district policy.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented strategies for student financial assistance. Community groups who support the scholarship selection and award process include statements of non-discrimination in their application materials. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. **Employment**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented strategies and school board policy 401.1, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. **Salary**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Charles City CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Charles City Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	The Charles City CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.		
Parking – The HS South lot currently has 188 parking stalls with 0 accessible stalls, and 0 van accessible stalls. This lot needs 8 total	HS South lot needs 8 total accessible stalls, with at least 1 stall being van accessible.	Upload photo documentation to CASA (see instructions)		

<p>stalls, with at least 1 stall being van accessible.</p> <p>The MS North lot currently has 54 parking stalls with 2 van accessible stalls. This lot needs 1 additional accessible stall.</p>	<p>MS North lot needs 1 additional accessible stall.</p>			
<p>Passenger Loading Zones – Signage displaying international symbol of accessibility at the accessible loading zone at the HS is lacking.</p>	<p>Need Signage displaying international symbol of accessibility at the accessible loading zone at the HS.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Entrances – HS Door #1 and MS Door #4: Needs to be identified by the international symbol of accessibility.</p> <p>HS Doors #3, 12, 19/22, 23, 25 – 31, 33, and 34, and MS Doors #3 and 10: Need directional signs indicating the nearest accessible entrance with arrows.</p>	<p>HS Door #1 and MS Door #4: Needs to be identified by the international symbol of accessibility.</p> <p>HS Doors #3, 12, 19/22, 23, 25 – 31, 33, and 34, and MS Doors #3 and 10: Need signs indicating the nearest accessible entrance with arrows.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Rooms and Spaces – Due to round door knobs, some room doors are non-compliant due to:</p> <ul style="list-style-type: none"> *Ability to open doors without too much force. *Doors are not operable without tight grasping, pinching, or twisting of the wrist. 	<p>Noncompliant handles/knobs must be replaced with ADA compliant handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>Toilet Rooms – All HS rest rooms (except Crossroads RRs) are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p> <p>HS Crossroads rest rooms need an accessible sign on the latch side of the door, and 60 inches above the floor.</p>	<p>All HS rest rooms (except Crossroads RRs) are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p> <p>HS Crossroads rest rooms need an accessible sign. On the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Shower Rooms – Old HS Gym locker rooms is not an accessible shower room and needs to be identified by international symbol of accessibility signs with Braille, and an arrow pointing to the accessible locker room. On the latch side of the door, and 60 inches above the floor.</p>	<p>Old HS Gym locker rooms is not an accessible shower room and needs to be identified by international symbol of accessibility signs with Braille, and an arrow pointing to the accessible locker room. On the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>V. Services for Students with Disabilities</p>				
<p>Services for Students with Disabilities – The documentation provided by Charles City CSD indicates school board policy 102.E3 (Section 504) is up to date. However, the district does not have a handbook or</p>	<p>Charles City CSD will develop, review and implement a handbook and policy to operationalize Section 504, in alignment with ADA requirements and district policy.</p>	<p>The district will submit documentation including a handbook and policy.</p>		<p>10/31/23</p>

forms which operationalize the policy to ensure services for students with disabilities are receiving an equitable education.				
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Signature of Superintendent

Date



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Charles City Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	The Charles City CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.	Anne Lunquist Superintendent	This report will be our written copy of our on-line publication to show where locations of bathrooms, entry ways, and parking spaces are located for our high school and middle school
Parking – The HS South lot currently has 188 parking stalls with 0 accessible stalls, and 0 van accessible stalls. This lot needs 8 total	HS South lot needs 8 total accessible stalls, with at least 1 stall being van accessible.	Upload photo documentation to CASA (see instructions)	Jerry Mitchell Director of Operations	Will create 8 handicapped parking spots with 2 van spots and signs next to front entrance of HS By 11/15/23

Iowa Department of Education

<p>stalls, with at least 1 stall being van accessible.</p> <p>The MS North lot currently has 54 parking stalls with 2 van accessible stalls. This lot needs 1 additional accessible stall.</p>	<p>MS North lot needs 1 additional accessible stall.</p>		<p>Jerry Mitchell Director of Operations</p>	<p>Will add 1 handicapped parking spot next to 2 existing spots. Will add a sign By 11/15/23</p>
<p>Passenger Loading Zones – Signage displaying international symbol of accessibility at the accessible loading zone at the HS is lacking.</p>	<p>Need Signage displaying international symbol of accessibility at the accessible loading zone at the HS.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jerry Mitchell Director of Operations</p>	<p>Will add sign on wall of school and paint blue on walk up entrance By 11/15/23</p>
<p>Entrances – HS Door #1 and MS Door #4: Needs to be identified by the international symbol of accessibility.</p> <p>HS Doors #3, 12, 19/22, 23, 25 – 31, 33, and 34, and MS Doors #3 and 10: Need directional signs indicating the nearest accessible entrance with arrows.</p>	<p>HS Door #1 and MS Door #4: Needs to be identified by the international symbol of accessibility.</p> <p>HS Doors #3, 12, 19/22, 23, 25 – 31, 33, and 34, and MS Doors #3 and 10: Need signs indicating the nearest accessible entrance with arrows.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jerry Mitchell Director of Operations</p>	<p>Ordered 2 symbol and accessibility signs to be put at numbered doors in request.</p> <p>Ordered 7 with left arrows and 4 with right arrows that will be put at numbered doors in request.</p> <p>By 11/15/23</p>
<p>Rooms and Spaces – Due to round door knobs, some room doors are non-compliant due to: *Ability to open doors without too much force. *Doors are not operable without tight grasping, pinching, or twisting of the wrist.</p>	<p>Noncompliant handles/knobs must be replaced with ADA compliant handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jerry Mitchell Director of Operations</p>	<p>Ordered and received 129 lever style handled locks. By 8/30/24</p>

<p>Toilet Rooms – All HS rest rooms (except Crossroads RRs) are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p> <p>HS Crossroads rest rooms need an accessible sign on the latch side of the door, and 60 inches above the floor.</p>	<p>All HS rest rooms (except Crossroads RRs) are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p> <p>HS Crossroads rest rooms need an accessible sign. On the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jerry Mitchell Director of Opeations</p>	<p>Ordered 1 left arrow sign and 3 right arrow signs with symbol on the signs to go outside public bathrooms to direct them to the crossroad bathrooms</p> <p>Ordered 1 female and 1 male accessible sign to put outside of each bathroom</p> <p>11/15/23</p>
<p>Shower Rooms – Old HS Gym locker rooms is not an accessible shower room and needs to be identified by international symbol of accessibility signs with Braille, and an arrow pointing to the accessible locker room. On the latch side of the door, and 60 inches above the floor.</p>	<p>Old HS Gym locker rooms is not an accessible shower room and needs to be identified by international symbol of accessibility signs with Braille, and an arrow pointing to the accessible locker room. On the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jerry Mitchell Director of Operations</p>	<p>For the boys locker room a sign will be added that it is not handicapped accessible and an arrow pointing to the MS locker room.</p> <p>For the girls locker room a sign will be added that it is handicapped accessible</p> <p>11/15/23</p>
<p>V. Services for Students with Disabilities</p>				
<p>Services for Students with Disabilities – The documentation provided by Charles City CSD indicates school board policy 102.E3 (Section 504) is up to date. However, the district does not have a handbook or</p>	<p>Charles City CSD will develop, review and implement a handbook and policy to operationalize Section 504, in alignment with ADA requirements and district policy.</p>	<p>The district will submit documentation including a handbook and policy.</p>	<p>Anne Lundquist Superintendent</p>	<p>10/31/23</p> <p>Completed and went through the board for approval. Copy of handbook and policy were sent to Tina Wahlert</p>

forms which operationalize the policy to ensure services for students with disabilities are receiving an equitable education.				
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Ann M. Lundquist
Signature of Superintendent

10/2/23
Date

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Wed, Sep 4, 2024 at 10:00 AM

Subject: MOA Equity Review - Noncompliance Items

To: Anne Lundquist <alundqu@charles-city.k12.ia.us>

Cc: prottinghaus@charles-city.k12.ia.us <prottinghaus@charles-city.k12.ia.us>, Heitz, Eric <eric.heitz@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>, Dennis McClain <dennis.mcclain@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>

Dear Superintendent Lundquist:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows one item requiring Charles City Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 25, 2023, it is critically important that this item is addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address the item no later than Friday, October 4, 2024, as the previous deadline has passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

2324-1116-5 Rooms and Spaces

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Lundquist at alundqu@charles-city.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educate.iowa.gov/pk-12/data/data-collections/casa>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>

George-Little Rock Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Thomas Luxford, Superintendent
George-Little Rock Community School District
309 South Lincoln Street, Suite 1
P.O. Box 6
George, IA 51237

Dear Superintendent Luxford:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide George-Little Rock Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement.

Creating excellence in education through leadership and service

Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

- Review of Facilities/ADA visit: Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of George-Little Rock CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: George-Little Rock CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 50.2 percent for CTE Concentrators.
- Indicator B: George-Little Rock CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 9.7 percent for CTE Concentrators.
- Indicator C: George-Little Rock CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 59.9 percent for CTE Concentrators.
- Indicator D: George-Little Rock CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 29.9 percent for CTE Concentrators.

If you have any questions, please contact Pam Spangler at 515-229-6425 or pam.spangler@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Pam Spangler, School Improvement Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:40 AM

Subject: Equity Review Letter and Desk Audit

To: tluxford@george-littlerock.org <tluxford@george-littlerock.org>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Luxford:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 11, 2023

Tom Luxford, Superintendent
George-Little Rock Community School District
309 South Lincoln Street, Suite 1
P.O. Box 6
George, IA 51237

Re: Iowa Department of Education Equity Review - Letter of Findings

Dear Superintendent Luxford:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, George-Little Rock Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because George-Little Rock High School is the only school in the school district that offers CTE programs, it is the only school in George-Little Rock CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

George-Little Rock CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of George-Little Rock CSD for an equity review are as follows:

Creating excellence in education through leadership and service

George-Little Rock CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of George-Little Rock CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: George-Little Rock CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 50.2 percent for CTE Concentrators.
- Indicator B: George-Little Rock CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 9.7 percent for CTE Concentrators.
- Indicator C: George-Little Rock CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 59.9 percent for CTE Concentrators.
- Indicator D: George-Little Rock CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 29.9 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

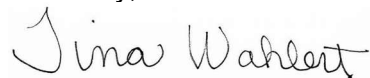
All required corrective actions must be included in George-Little Rock CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the

timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Austin Lloyd, George-Little Rock CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

George-Little Rock Community School District

Letter of Findings



September 11, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by George-Little Rock CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by George-Little Rock CSD is appropriately communicated and contains all required protected classes for both programs and employment. The address to the Office of Civil Rights is incorrect.

Recommendations:

- The address for the Office of Civil Rights may be included in the notice of nondiscrimination. The decision may be made by the district. Should the decision include keeping the Office for Civil Rights listed, the address is: Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education, John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email: OCR.Chicago@ed.gov

Required Corrective Action(s):

- There are no corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- George-Little Rock CSD has not appropriately designated an equity coordinator and has not communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- George-Little Rock CSD district is required to annually designate and approve the equity coordinator.
- The district is required to show school board minutes reflecting the designation and approval of the equity coordinator as proof of compliance.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- George-Little Rock CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- George-Little Rock CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by George-Little Rock CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD includes the LAU plan but does not specifically indicate how the school district appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- George-Little Rock CSD is required to formalize a written plan to ensure that counseling services are implemented for students with limited English-speaking ability and hearing impairments.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates the school district conducts meetings to ensure that recruitment and promotional activities appropriately implemented.

- There is no documentation provided to indicate course enrollment-related trends noted over the past three years, along with a summary of steps taken to increase participation in programs where disproportion was found.

Required Corrective Action(s):

- George-Little Rock CSD is required to provide evidence of course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends).
- George-Little Rock CSD is required to provide evidence of steps taken to increase participation in programs where disproportion was found.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The George-Little Rock Community School District’s middle school/high school building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

George-Little Rock Middle School/High School, 500 East Indiana Avenue, George, Iowa 51237

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1920 – 2 Story Bldg.	Programs within facility must be readily accessible
Addition & Renovation	1960 – Lower East 1980 – Old Commons 2006 – Auditorium, Gym, New Commons	Programs within facility must be readily accessible

Some non-compliance with ADA accessibility was identified at the middle school/high school building during the visit. For the areas that were constructed or updated prior to 1977, the district must submit a written plan describing how the programs and services in the building that are inaccessible are made available to students, staff, parents, and community members with disabilities. Likewise, non-compliance issues in portions of the building that were constructed or updated after 1977 will need to be brought into compliance, as per ADA Standards.

At the middle school/high school building, signage is lacking and needs to be addressed in accordance with the cited issues from above. Inaccessible entrances need directional signs

indicating the location of the nearest accessible entrance and accessible entrances need signs identified by the international symbol of accessibility. It was also noted that the Passenger Loading Zone also needs appropriate accessibility signage.

The following issues need to be addressed in the toilet rooms and shower rooms: Accessible toilet rooms and shower rooms must be identified by the international symbol of accessibility and inaccessible toilet rooms and shower rooms must have directional signage to accessible toilet rooms and shower rooms.

The library checkout and book return areas are not within the acceptable height of 28 to 34 inches, and need to be corrected. Additionally, some door handles are found to not be compliant.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible.	Programs within facility must be readily accessible.
Parking	Van Accessible Handicap Parking stalls need appropriate "Van Accessible" signage.	ADA Standard 4.6.4, 4.30.7	ADA Standard 4.6.4, 4.30.7
Exterior Route of Travel	Inaccessible entrances need signs indicating the location of the nearest	ADA Standard 4.7.1	ADA Standard 4.7.1

	<p>accessible entrance. (Doors: 2, 3, 5, 6, 7, and 8)</p> <p>Accessible entrances need signs identified by the international symbol of accessibility.</p> <p>Proposed sign indicating times when this door is accessible (i.e. Accessible for Evening Events Only, or Accessible After School Hours, etc.) (Door #4)</p>		
Passenger Loading Zones	Passenger Loading Zone area needs appropriate sign displaying the international symbol of accessibility.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Elevator	<p>1) Does not have both audible and visual door opening/closing and floor indicators.</p> <p>2) Buttons in the hallway are not at least $\frac{3}{4}$ inches wide and centered at 48 inches.</p> <p>3) Hall call buttons do not have visual signals to indicate when each call is registered and answered.</p> <p>4) No sign on the jamb of each floor identifying the floor in raised braille letters.</p> <p>5) Door opening is not at least 36 inches wide.</p> <p>6) Minimum inside dimensions of the car are not 51 inches by 80 inches. Controls inside the cab do not have raised braille lettering.</p>	<p>1) ADA Standard 4.10.4</p> <p>2) ADA Standard 4.10.3</p> <p>3) ADA Standard 4.10.3</p> <p>4) ADA Standard 4.10.5, 4.30.4</p> <p>5) ADA Standard 4.10.9</p> <p>6) ADA Standard 4.10.9</p> <p>7) ADA Standard 4.10.12(2), 4.30.4</p>	<p>1) ADA Standard 4.10.4</p> <p>2) ADA Standard 4.10.3</p> <p>3) ADA Standard 4.10.3</p> <p>4) ADA Standard 4.10.5, 4.30.4</p> <p>5) ADA Standard 4.10.9</p> <p>6) ADA Standard 4.10.9</p> <p>7) ADA Standard 4.10.12(2), 4.30.4</p>
Rooms and Spaces	Some classroom door handles are not compliant (round handles).	ADA Standard 4.13.9, 4.13.11	ADA Standard 4.13.9, 4.13.11
Toilet Rooms	<p>1) Accessible toilet room must be identified by the international symbol of accessibility. (Old Commons Staff RR)</p> <p>2) Inaccessible restrooms must have directional signage to the accessible restroom. (Women's and Men's RR at North Library Corner)</p>	<p>1) ADA Standard 4.1.2(7)(d)</p> <p>2) ADA Standard 4.1.6(3)(e)(iii); 4.30</p>	<p>1) ADA Standard 4.1.2(7)(d)</p> <p>2) ADA Standard 4.1.6(3)(e)(iii); 4.30</p>
Shower Room	Need an international symbol of accessibility sign at shower room entrance (Boys LR)	ADA Standard 4.1.2(7)(d)	ADA Standard 4.1.2(7)(d)
Library	Checkout counter is not 28-34-inches above the floor.	ADA Standard 8.2, 4.32.4	ADA Standard 8.2, 4.32.4

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- George-Little Rock Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates school board policy 102.E3 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates the school district has some strategies provided for student financial assistance. There does not appear to be a procedure to ensure second language students receive the information in their native language.
- The DEMCO scholarship information and application does not have the notice of nondiscrimination at the bottom of the page.

Recommendations:

- It is recommended that George-Little Rock CSD work closely with foundation and scholarship partners to include the nondiscrimination notice with all scholarship information and applications.

Required Corrective Action(s):

- George-Little Rock CSD must have a written set of procedures to ensure that second language students receive scholarship information in their native language.
- The DEMCO scholarship information must include the notice of nondiscrimination.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The course handbook provided by the district indicates that work study is offered. There was no documentation provided to indicate the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- George-Little Rock CSD must submit a copy of a workplace-based contract and application that includes the district's nondiscrimination notice.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates that school district school board policy 401 is available to ensure equity related to employment and personnel practices.
- There was no documentation provided to ensure that the district has appropriately implemented strategies to ensure equity related employment and personnel practices.

Recommendations:

- It is recommended that George-Little Rock CSD review all job applications to ensure that the notice of nondiscrimination is written in its entirety.
- The address for the Office of Civil Rights may be included in the notice of nondiscrimination. The decision may be made by the district. Should the decision include

keeping the Office for Civil Rights listed, the address is: Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education, John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email: OCR.Chicago@ed.gov

Required Corrective Action(s):

- George-Little Rock CSD must provide samples of job postings over the past three years (this would include licensed and unlicensed staff) and a Personnel Hiring Manual that includes the district's nondiscrimination notice.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by George-Little Rock CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 11, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

George-Little Rock Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Appointment of Equity Coordinator and summary of coordinator activities. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	George-Little Rock CSD Board of Directors is required to annually designate one or more Equity Coordinator(s).	Evidence of this will be shown through current school board minutes.		10/20/23
II. Recruitment, Admissions and Counseling				
Counseling of Students with Limited English-Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	George-Little Rock CSD is required to formalize a written plan to ensure that counseling services are implemented for students with limited English-speaking ability and hearing impairments.	Evidence will include a written plan that ensure counseling services for students with limited English-speaking abilities along with students with hearing impairments is provided.		10/20/23

<p>Recruitment and Promotional Activities. Attendance center and course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23</p>	<p>George-Little Rock CSD is required to provide evidence of course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends)</p>	<p>Evidence of this will be shown through course enrollment trends noted over the past three years.</p>		<p>10/20/23</p>
<p>Recruitment and Promotional Activities. Attendance center and course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23</p>	<p>George-Little Rock CSD is required to provide evidence of steps taken to increase participation in programs where disproportion was found.</p>	<p>Evidence of this will be shown through minutes of a meeting reviewing course enrollment data.</p>		<p>10/20/23</p>
<p>III. Accessibility for Students with Disabilities</p>				
<p>High School: Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are</p>	<p>The George-Little Rock CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		

inaccessible are made available to students, staff, parents, and community members with disabilities.				
Parking – Van Accessible Handicap Parking stalls need appropriate “Van Accessible” signage.	Van accessible parking stalls need compliant signage.	Upload photo documentation to CASA (see instructions)		
Passenger Loading Zones – Signage with international symbol for accessibility at the accessible loading zone.	Passenger loading zones need compliant signage.	Upload photo documentation to CASA (see instructions)		
<p>Exterior Route of Travel – Inaccessible entrances need signs indicating the location of the nearest accessible entrance. (Doors: 2, 3, 5, 6, 7, and 8)</p> <p>Accessible entrances need signs identified by the international symbol of accessibility.</p> <p>Proposed sign indicating times when this door is accessible (i.e. Accessible for Evening Events Only, or Accessible After School Hours, etc.) (Door #4)</p>	<p>Inaccessible entrances need signs indicating the location of the nearest accessible entrance. (Doors: 2, 3, 5, 6, 7, and 8)</p> <p>Accessible entrances need signs identified by the international symbol of accessibility.</p>	Upload photo documentation to CASA (see instructions)		
Elevator – Does not have both audible and visual door opening/closing and floor indicators.	The elevator needs the following: 1) both audible and visual door opening/closing and floor indicators; 2) buttons in hallway at least ¾ inches wide and centered at 48	Upload photo documentation to CASA (see instructions)		

<p>Buttons in the hallway are not at least ¾ inches wide and centered at 48 inches.</p> <p>Hall call buttons do not have visual signals to indicate when each call is registered and answered.</p> <p>No sign on the jamb of each floor identifying the floor in raised braille letters.</p> <p>Door opening is not at least 36 inches wide.</p> <p>Minimum inside dimensions of the car are not 51 inches by 80 inches.</p> <p>Controls inside the cab do not have raised braille lettering.</p>	<p>inches; 3) hall call buttons need visual signals indicating when each call is registered and answered; 4) sign on jamb of each floor identifying the floor in raised braille letters; 5) door opening that is at least 36 inches wide; 6) interior dimensions at least 51 x 80 inches; 7) controls inside cab need raised braille letters.</p>			
<p>Rooms and Spaces – Some classroom door handles are not compliant (round handles).</p>	<p>Need compliant door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Toilet Rooms – Accessible toilet room must be identified by the international symbol of accessibility. (Old Commons Staff RR)</p> <p>Inaccessible restrooms must have directional signage to the accessible restroom. (Women’s and Men’s RR at North Library Corner)</p>	<p>Accessible toilet room must be identified by the international symbol of accessibility. (Old Commons Staff RR)</p> <p>Inaccessible restrooms must have directional signage to the accessible restroom. (Women’s and</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

	Men's RR at North Library Corner)			
Shower Rooms – Need an international symbol of accessibility sign at shower room entrance (Boys LR)	Need an international symbol of accessibility sign at shower room entrance (Boys LR)	Upload photo documentation to CASA (see instructions)		
Library – Checkout counter over 34 inches high. Needs to be 28 to 34 inches.	Checkout counter needs to be 28 to 34 inches.	Upload photo documentation to CASA (see instructions)		
VI. Financial Assistance				
Financial Assistance, which includes information on honors, awards, and scholarships, are available to all persons regardless of race, color, national origin, sex or disability. OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	George-Little Rock CSD does not have procedures in place to ensure that second language students receive scholarship information in their native language.	Evidence of this will be shown through a written set of procedures to ensure that second language students receive scholarship information in their native language.		10/20/23
Financial Assistance, which includes information on honors, awards, and scholarships, are available to all persons regardless of race, color, national origin, sex or disability. OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	The DEMCO scholarship information must include the notice of nondiscrimination.	Evidence of this will be shown through a revised copy of the DEMCO scholarship information.		10/20/23
VII. Work-Study, Cooperative Programs, and Job Placement				

<p>Work-study, cooperative programs, and job placement must include a list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions. OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)</p>	<p>George-Little Rock CSD must submit a copy of a workplace-based contract and application that must include the district's nondiscrimination notice, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.</p>	<p>Evidence of this will include a copy of a workplace-based contract and application that must include the district's nondiscrimination notice.</p>		<p>10/20/23</p>
<p>VIII. Employment</p>				
<p>Employment information must include documentation of employment practices including screening/hiring policies and procedures. OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61</p>	<p>George-Little Rock CSD is required to provide samples of job postings over the past three years (this would include licensed and unlicensed staff) and a Personnel Hiring Manual including the notice of nondiscrimination.</p>	<p>Evidence of this will include job sample over the past three years and a Personnel Hiring Manual.</p>		<p>10/20/23</p>

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Signature of Superintendent

Date






September 11, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

George-Little Rock Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Appointment of Equity Coordinator and summary of coordinator activities. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	George-Little Rock CSD Board of Directors is required to annually designate one or more Equity Coordinator(s).	Evidence of this will be shown through current school board minutes.	Superintendent Tom Luxford	10/20/23
II. Recruitment, Admissions and Counseling				
Counseling of Students with Limited English-Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	George-Little Rock CSD is required to formalize a written plan to ensure that counseling services are implemented for students with limited English-speaking ability and hearing impairments.	Evidence will include a written plan that ensure counseling services for students with limited English-speaking abilities along with students with hearing impairments is provided.	↓	10/20/23

<p>Recruitment and Promotional Activities. Attendance center and course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23</p>	<p>George-Little Rock CSD is required to provide evidence of course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends)</p>	<p>Evidence of this will be shown through course enrollment trends noted over the past three years.</p>		<p>10/20/23</p>
<p>Recruitment and Promotional Activities. Attendance center and course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23</p>	<p>George-Little Rock CSD is required to provide evidence of steps taken to increase participation in programs where disproportion was found.</p>	<p>Evidence of this will be shown through minutes of a meeting reviewing course enrollment data.</p>		<p>10/20/23</p>
<p>III. Accessibility for Students with Disabilities</p>				
<p>High School: Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are</p>	<p>The George-Little Rock CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>	<p>Tom Luxford</p> 	

Iowa Department of Education

inaccessible are made available to students, staff, parents, and community members with disabilities.				
Parking – Van Accessible Handicap Parking stalls need appropriate “Van Accessible” signage.	Van accessible parking stalls need compliant signage.	Upload photo documentation to CASA (see instructions)	Tom Lufford ↓	11-1-2024
Passenger Loading Zones – Signage with international symbol for accessibility at the accessible loading zone.	Passenger loading zones need compliant signage.	Upload photo documentation to CASA (see instructions)	↓	11-1-2024
Exterior Route of Travel – Inaccessible entrances need signs indicating the location of the nearest accessible entrance. (Doors: 2, 3, 5, 6, 7, and 8) Accessible entrances need signs identified by the international symbol of accessibility. Proposed sign indicating times when this door is accessible (i.e. Accessible for Evening Events Only, or Accessible After School Hours, etc.) (Door #4)	Inaccessible entrances need signs indicating the location of the nearest accessible entrance. (Doors: 2, 3, 5, 6, 7, and 8) Accessible entrances need signs identified by the international symbol of accessibility.	Upload photo documentation to CASA (see instructions)		11-1-2024
Elevator – Does not have both audible and visual door opening/closing and floor indicators.	The elevator needs the following: 1) both audible and visual door opening/closing and floor indicators; 2) buttons in hallway at least ¾ inches wide and centered at 48	Upload photo documentation to CASA (see instructions)		↓

<p>Buttons in the hallway are not at least ¾ inches wide and centered at 48 inches.</p> <p>Hall call buttons do not have visual signals to indicate when each call is registered and answered.</p> <p>No sign on the jamb of each floor identifying the floor in raised braille letters.</p> <p>Door opening is not at least 36 inches wide.</p> <p>Minimum inside dimensions of the car are not 51 inches by 80 inches.</p> <p>Controls inside the cab do not have raised braille lettering.</p>	<p>inches; 3) hall call buttons need visual signals indicating when each call is registered and answered; 4) sign on jamb of each floor identifying the floor in raised braille letters; 5) door opening that is at least 36 inches wide; 6) interior dimensions at least 51 x 80 inches; 7) controls inside cab need raised braille letters.</p>		<p>Tom Lutford</p> <p style="text-align: center;">↓</p>	<p>12-1-2024</p>
<p>Rooms and Spaces – Some classroom door handles are not compliant (round handles).</p>	<p>Need compliant door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Tom Lutford</p> <p style="text-align: center;">↓</p>	
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We are doing our HVAC Construction on 4/20/2024 to 8/11/2024

	Men's RR at North Library Corner)			
Shower Rooms – Need an international symbol of accessibility sign at shower room entrance (Boys LR)	Need an international symbol of accessibility sign at shower room entrance (Boys LR)	Upload photo documentation to CASA (see instructions)	Tom Luxford	11-1-2024
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<p>Work-study, cooperative programs, and job placement must include a list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions. OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)</p>	<p>George-Little Rock CSD must submit a copy of a workplace-based contract and application that must include the district's nondiscrimination notice, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.</p>	<p>Evidence of this will include a copy of a workplace-based contract and application that must include the district's nondiscrimination notice.</p>	<p>Tom Luxford</p>	<p>10/20/23</p>
<p>VIII. Employment</p>				
<p>Employment information must include documentation of employment practices including screening/hiring policies and procedures. OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61</p>	<p>George-Little Rock CSD is required to provide samples of job postings over the past three years (this would include licensed and unlicensed staff) and a Personnel Hiring Manual including the notice of nondiscrimination.</p>	<p>Evidence of this will include job sample over the past three years and a Personnel Hiring Manual.</p>	<p>↓</p>	<p>10/20/23</p>

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 Signature of Superintendent

11-20-2023

 Date

Glenwood Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Devin Embray, Superintendent
Glenwood Community School District
103 Central Street, Suite 300
Glenwood, IA 51534

Dear Superintendent Embray:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Glenwood Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Janet Boyd, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

Creating excellence in education through leadership and service

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Glenwood CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Glenwood CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 36.3 percent for CTE Concentrators.
- Indicator B: Glenwood CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 18.03 percent for CTE Concentrators.
- Indicator C: Glenwood CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 54.37 percent for CTE Concentrators.
- Indicator D: Glenwood CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.18 percent for CTE Concentrators

If you have any questions, please contact Janet Boyd at 515-745-3385 or janet.boyd@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Janet Boyd, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:43 AM

Subject: Equity Review Letter and Desk Audit

To: embrayd@glenwoodschoools.org <embrayd@glenwoodschoools.org>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Boyd, Janet <janet.boyd@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Embray:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 25, 2023

Devin Embray
Superintendent
Glenwood Community School District
103 Central Street, Suite 300
Glenwood, IA 51534

Re: Iowa Department of Education Equity Review – Letter of Findings

Dear Superintendent Embray:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Glenwood Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Glenwood CSD's Senior High School is the only school in the school district that offers CTE programs, it is the only school in Glenwood CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Glenwood CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Glenwood CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Glenwood CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Glenwood CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Glenwood CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 36.3 percent for CTE Concentrators.
- Indicator B: Glenwood CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 18.03 percent for CTE Concentrators.
- Indicator C: Glenwood CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 54.37 percent for CTE Concentrators.
- Indicator D: Glenwood CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.18 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Glenwood CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for

completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Curt Becker, Glenwood CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Janet Boyd, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Glenwood Community School District

Letter of Findings



September 25, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Glenwood CSD is published on the district's website at the bottom of the landing page and contains career and technical education (CTE) programs and all required protected classes for both programs and employment. The district also provided board policy 104.1N1 – Annual Notice of Nondiscrimination, which contains CTE programs and other required information.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Glenwood CSD is appropriately communicated and contains all required protected classes for both programs and employment. The district also provided board policy 104.1N2 – Continuous Notice of Nondiscrimination, which contains all required information.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Glenwood CSD has appropriately designated an equity coordinator as evidenced by the September 12, 2022 school board minutes. Glenwood CSD has communicated the role and duties to staff, students, and community members as evidenced by appropriate notices and board policy.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Glenwood CSD has appropriately implemented and communicated the grievance procedures in school board policy number 104.1R1 – General Grievance Procedures and 104.2CF/104.1E2 - COMPLAINT FORM (Discrimination, Anti-Bullying, and Anti-Harassment).

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Glenwood CSD School Board policy number 104.2 – Anti-Bullying and Anti-Harassment Policy includes the protected classes. The policy also contains the locations of where the information is published and where copies of complaint forms are located.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Glenwood CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The 2023-2024 Course Guidebook provided by Glenwood CSD indicates the district offers a wide range of courses and opportunities but does not address procedures to ensure access for students with limited English language skills. Results of a word search of both the district website and the course guidebook did not yield any information regarding the services offered to Limited English Language students or families.

Required Corrective Action(s):

- The district must address the lack of resources for limited English speaking by providing a link or page on the website, provide contact information for district and/or Area Education Agency (AEA) staff who specialize in English learner services, or address services in the Course Guidebook.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- Glenwood CSD provided the minimum documentation to indicate the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Recommendations:

- The district website, <https://www.glenwoodschoools.org/>, had numerous resources for students but these links were not provided in the document upload. The district is encouraged to continue to utilize and refine the district counseling resources on the district website.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Recommendations:

- The district does not have any written documentation or procedures in place to assist limited English-speaking students or hearing-impaired students. Services appear to be people dependent. We recommend that the district develop and implement written procedures.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has appropriately implemented recruitment and promotional activities. The document provided contained both data elements and priorities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Glenwood Community School District’s Senior High School building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Glenwood, Senior High School Building, 504 E Sharp St., Glenwood, IA 51534

Building / Additions	Construction Year	Applicable Review Standard
Original construction	2010	Programs within facility must be readily accessible.

Only one ADA accessibility non-compliance finding was identified at the high school building during the visit. All hot water pipes and drain pipes must be insulated or configured to avoid contact with the legs of a person using a wheelchair. There was one hot water pipe identified not insulated located in the women’s locker room.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will

be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Toilet Rooms	All hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair.	ADA Standard 4.19.4	ADA Standard 4.19.4

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Glenwood Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has reviewed and revised the District Developed Service Deliver Plan (DDSDP) as of March 2023. The DDSDP committee contained district staff, parents, and Green Hills AEA staff. The plan appears to contain all the required components. No documentation or policies governing Section 504 were provided.

Required Corrective Action(s):

- The district needs to provide documentation regarding the process for students who qualify for Section 504, such as Section 504 Procedures Manual and/or forms.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance. In addition, the district has included scholarship information in the Course Guide and on the district website.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The school district was not able to provide evidence of these programs, such as contracts with employers offering work experience.

Required Corrective Action(s):

- If the district provides work-study, cooperative programs, job placement and/or apprenticeship programs the district will need to provide those materials and assure the materials have the appropriate non-discrimination statements.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has appropriately implemented strategies and school board policy 104.1 – Equal Opportunity and Non-Discrimination, Non-Harassment, Non-Retaliation, to ensure equity related to employment and personnel practices. However, the Internal job postings did not have the appropriate nondiscrimination notices included.

Required Corrective Action(s):

- The Current Employment Job postings must contain the nondiscrimination notice for employment.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Glenwood CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement. It appears that the district has clearly communicated salaries and benefits.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Glenwood Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
II. Recruitment, Admissions and Counseling				
Access for National Minority Students with Limited English Language Skills – The district must address the lack of resources for limited English-speaking students by providing a link or page on the website, providing contact information for district and/or Area Education Agency (AEA) staff who specialize in English learner services, or address services in the Course Guidebook. Guidelines section IV.L.	Provide a link or page on the website, provide contact information for district and/or Area Education Agency (AEA) staff who specialize in English learner services, or address services in the Course Guidebook	Evidence will include a corrected Course Guidebook or other documentation showing resources and services.		10/31/23
III. Accessibility for Students with Disabilities				

<p>Toilet Rooms – All hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair. There was one hot water pipe identified not insulated located in the women’s locker room.</p>	<p>One hot water pipe in women’s locker room must be insulated.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>V. Services for Students with Disabilities</p>				
<p>No documentation or policies governing Section 504 were provided. Guidelines sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130.</p>	<p>The district needs to provide documentation regarding the process for students who qualify for Section 504, such as Section 504 Procedures Manual and/or forms.</p>	<p>Evidence will include a corrected Procedures Manual and/or forms.</p>		<p>10/31/23</p>
<p>VII. Work-Study, Cooperative Programs, and Job Placement</p>				
<p>The school district was not able to provide evidence of these programs, such as contracts with employers offering work experience. <i>Guidelines</i> sections VII.A and B, 34 CFR section 106.38(a).</p>	<p>If the district provides work-study, cooperative programs, job placement and/or apprenticeship programs the district will need to provide those materials and assure the materials have the appropriate non-discrimination statements.</p>	<p>Evidence will include corrected materials for work-study, cooperative programs, job placement and/or apprenticeship programs.</p>		<p>10/31/23</p>
<p>VIII. Employment</p>				

<p>The Internal job postings did not have the appropriate nondiscrimination notices included. Guidelines sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61</p>	<p>The job postings must include the appropriate nondiscrimination notices.</p>	<p>Evidence will include the corrected job postings and application.</p>		<p>10/31/23</p>
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Signature of Superintendent

Date



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Glenwood Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
II. Recruitment, Admissions and Counseling				
<p>Access for National Minority Students with Limited English Language Skills – The district must address the lack of resources for limited English-speaking students by providing a link or page on the website, providing contact information for district and/or Area Education Agency (AEA) staff who specialize in English learner services, or address services in the Course Guidebook. Guidelines section IV.L.</p>	<p>Provide a link or page on the website, provide contact information for district and/or Area Education Agency (AEA) staff who specialize in English learner services, or address services in the Course Guidebook</p>	<p>Evidence will include a corrected Course Guidebook or other documentation showing resources and services.</p>	<p><i>Jedd Taylor</i> <i>Tech Director</i> <i>712-527-0092</i></p>	<p>10/31/23</p>
III. Accessibility for Students with Disabilities				

<p>Toilet Rooms – All hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair. There was one hot water pipe identified not insulated located in the women's locker room.</p>	<p>One hot water pipe in women's locker room must be insulated.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Devin Embrey 712-527-0087</p>	<p>10/10/23 complete</p>
<p>V. Services for Students with Disabilities</p>				
<p>No documentation or policies governing Section 504 were provided. Guidelines sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130.</p>	<p>The district needs to provide documentation regarding the process for students who qualify for Section 504, such as Section 504 Procedures Manual and/or forms.</p>	<p>Evidence will include a corrected Procedures Manual and/or forms.</p>	<p>Jed Taylor Cindy Mendez 712-527-0070</p>	<p>10/31/23</p>
<p>VII. Work-Study, Cooperative Programs, and Job Placement</p>				
<p>The school district was not able to provide evidence of these programs, such as contracts with employers offering work experience. <i>Guidelines</i> sections VII.A and B, 34 CFR section 106.38(a).</p>	<p>If the district provides work-study, cooperative programs, job placement and/or apprenticeship programs the district will need to provide those materials and assure the materials have the appropriate non-discrimination statements.</p>	<p>Evidence will include corrected materials for work-study, cooperative programs, job placement and/or apprenticeship programs.</p>	<p>Corraine Duntzman 712-527-0088</p>	<p>10/31/23</p>
<p>VIII. Employment</p>				

<p>The Internal job postings did not have the appropriate nondiscrimination notices included. Guidelines sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61</p>	<p>The job postings must include the appropriate nondiscrimination notices.</p>	<p>Evidence will include the corrected job postings and application.</p>	<p>Chad Loring 712-577-0073</p>	<p>10/31/23</p>
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Signature of Superintendent

10-10-23
Date

Glidden-Ralston Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Kreg Lensch, Superintendent
Glidden-Ralston Community School District
602 Idaho Street
Glidden, IA 51443

Dear Superintendent Lensch:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Glidden-Ralston Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Eric Heitz, Administrative Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations, at 515-402-8700 or scott.dryer@iowa.gov.

Creating excellence in education through leadership and service

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the ten 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Glidden-Ralston CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Glidden-Ralston CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 34.8 percent for CTE Concentrators.
- Indicator B: Glidden-Ralston CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 19.8 percent for CTE Concentrators.
- Indicator C: Glidden-Ralston CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 54.7 percent for CTE Concentrators.
- Indicator D: Glidden-Ralston CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.3 percent for CTE Concentrators.

If you have any questions, please contact Eric Heitz, Administrative Consultant, Bureau of School Improvement, at 515-402-3769 or eric.heitz@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:47 AM

Subject: Equity Review Letter and Desk Audit

To: klensch@glidden-ralston.k12.ia.us <klensch@glidden-ralston.k12.ia.us>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Lensch:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday
7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.



September 15, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Glidden-Ralston Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School:</p> <p>Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Glidden-Ralston CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>PARKING – Need one additional accessible parking stall, with sign. At</p>	<p>Need one additional accessible parking stall. Van accessible parking</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

least one accessible stall needs "Van Accessible" signage.	stall(s) need compliant signage.			
PASSANGER LOADING ZONE – Signage displaying international symbol of accessibility at the accessible loading zone is lacking. A curb or a detectable warning surface need to be added to the loading zone area.	<p>Passenger loading zones need compliant signage.</p> <p>A curb or a detectable warning surface need to be added to the loading zone area.</p>	Upload photo documentation to CASA (see instructions)		
RAMPS – Ramps located in the Industrial Technology area are greater than 1:12 in slope.	Ramps must have a slope no greater than 1:12.	Upload photo documentation to CASA (see instructions)		
<p>ENTRANCES – Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility (at backdoor with intercom/speaker).</p>	<p>Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility (at backdoor with intercom/speaker).</p>	Upload photo documentation to CASA (see instructions)		
ROOMS and SPACES – Business, IT, FACS classrooms, and the office and nurse's office door knobs cannot be accessed without twisting your wrist.	Noncompliant handles/knobs must be replaced with ADA compliant handles.	Upload photo documentation to CASA (see instructions)		
TOILET ROOMS – The hot water pipes and drain pipes under the sinks in the	The hot water pipes and drain pipes under the sinks in the accessible	Upload photo documentation to CASA (see instructions)		

<p>accessible toilet room are not insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Accessible toilet room must be identified by the international symbol of accessibility.</p> <p>A sign at the inaccessible toilet rooms need to give directions to the accessible toilet rooms.</p> <p>Tactile signage identifying the restrooms. On the latch side of the door, and 60 inches above the floor.</p>	<p>toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Accessible toilet room(s) must be identified by the international symbol of accessibility.</p> <p>Inaccessible restrooms must have directional signage to the accessible toilet room(s).</p> <p>Tactile signage identifying the restrooms. On the latch side of the door, and 60 inches above the floor.</p>			
<p>SHOWER ROOMS – Smith Unit shower rooms are not accessible due to lack of compliant grab bars in shower stall.</p>	<p>Smith Unit shower rooms needs compliant grab bars added to make shower stall accessible.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>LIBRARY – Checkout counter is over 34 inches high.</p>	<p>Checkout counter needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>CAFETERIA – Tray return over 34 inches high.</p>	<p>Tray return needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date



September 15, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Glidden-Ralston Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School:</p> <p>Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Glidden-Ralston CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>PARKING – Need one additional accessible parking stall, with sign. At</p>	<p>Need one additional accessible parking stall. Van accessible parking</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

least one accessible stall needs "Van Accessible" signage.	stall(s) need compliant signage.			
PASSANGER LOADING ZONE – Signage displaying international symbol of accessibility at the accessible loading zone is lacking. A curb or a detectable warning surface need to be added to the loading zone area.	<p>Passenger loading zones need compliant signage.</p> <p>A curb or a detectable warning surface need to be added to the loading zone area.</p>	Upload photo documentation to CASA (see instructions)		
RAMPS – Ramps located in the Industrial Technology area are greater than 1:12 in slope.	Ramps must have a slope no greater than 1:12.	Upload photo documentation to CASA (see instructions)		
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ROOMS and SPACES – Business, IT, FACS classrooms, and the office and nurse's office door knobs cannot be accessed without twisting your wrist.	Noncompliant handles/knobs must be replaced with ADA compliant handles.	Upload photo documentation to CASA (see instructions)		
TOILET ROOMS – The hot water pipes and drain pipes under the sinks in the	The hot water pipes and drain pipes under the sinks in the accessible	Upload photo documentation to CASA (see instructions)		

<p>accessible toilet room are not insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Accessible toilet room must be identified by the international symbol of accessibility.</p> <p>A sign at the inaccessible toilet rooms need to give directions to the accessible toilet rooms.</p> <p>Tactile signage identifying the restrooms. On the latch side of the door, and 60 inches above the floor.</p>	<p>toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Accessible toilet room(s) must be identified by the international symbol of accessibility.</p> <p>Inaccessible restrooms must have directional signage to the accessible toilet room(s).</p> <p>Tactile signage identifying the restrooms. On the latch side of the door, and 60 inches above the floor.</p>			
<p>SHOWER ROOMS – Smith Unit shower rooms are not accessible due to lack of compliant grab bars in shower stall.</p>	<p>Smith Unit shower rooms needs compliant grab bars added to make shower stall accessible.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>LIBRARY – Checkout counter is over 34 inches high.</p>	<p>Checkout counter needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>CAFETERIA – Tray return over 34 inches high.</p>	<p>Tray return needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date



September 15, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Glidden-Ralston Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
High School: Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	The Glidden-Ralston CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.	Kreg Lensch Superintendent	10/30/23
PARKING – Need one additional accessible parking stall, with sign. At	Need one additional accessible parking stall. Van accessible parking	Upload photo documentation to CASA (see instructions)	Jason Olberding building and Grounds maintenance	8/1/24

Iowa Department of Education

least one accessible stall needs "Van Accessible" signage.	stall(s) need compliant signage.			
PASSANGER LOADING ZONE – Signage displaying international symbol of accessibility at the accessible loading zone is lacking. A curb or a detectable warning surface need to be added to the loading zone area.	<p>Passenger loading zones need compliant signage.</p> <p>A curb or a detectable warning surface need to be added to the loading zone area.</p>	Upload photo documentation to CASA (see instructions)	Jason Olberding Building and Grounds	8/1/24
RAMPS – Ramps located in the Industrial Technology area are greater than 1:12 in slope.	Ramps must have a slope no greater than 1:12.	Upload photo documentation to CASA (see instructions)	Gregg Platt Head of Maintenance	8/1/24
<p>ENTRANCES – Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility (at backdoor with intercom/speaker).</p>	<p>Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility (at backdoor with intercom/speaker).</p>	Upload photo documentation to CASA (see instructions)	Kreg Lensch Superintendent	12/31/23
ROOMS and SPACES – Business, IT, FACS classrooms, and the office and nurse's office door knobs cannot be accessed without twisting your wrist.	Noncompliant handles/knobs must be replaced with ADA compliant handles.	Upload photo documentation to CASA (see instructions)	Gregg Platt Head of Maintenance	8/1/24
TOILET ROOMS – The hot water pipes and drain pipes under the sinks in the	The hot water pipes and drain pipes under the sinks in the accessible	Upload photo documentation to CASA (see instructions)	Jason Olberding Building and Grounds	12/31/23

Iowa Department of Education

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<p>SHOWER ROOMS – Smith Unit shower rooms are not accessible due to lack of compliant grab bars in shower stall.</p>	<p>Smith Unit shower rooms needs compliant grab bars added to make shower stall accessible.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jason Olberding Building and Grounds</p>	<p>12/31/23</p>
<p>LIBRARY – Checkout counter is over 34 inches high.</p>	<p>Checkout counter needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Kreg Lensch Superintendent</p>	<p>12/31/23</p>
<p>CAFETERIA – Tray return over 34 inches high.</p>	<p>Tray return needs to be 28 to 34 inches.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Kreg Lensch Superintendent</p>	<p>12/31/23</p>



 Signature of Superintendent

10-25-23

 Date

Accessibility Plan
Glidden-Ralston Community Schools

- I. For parts of the school that were constructed or altered before June 4, 1977, the district commits to ensuring that any identified inaccessible portions of the building, services, or programs will be made available to students staff and parents. Accessible areas will be identified and communicated within the building in a manner that is compliant with ADA requirements.
- II. All inaccessible entrances will have signage indicating the location of the nearest accessible entrance and will be properly identified.
- III. All inaccessible restrooms will have directional signage to the nearest accessible restroom and will be properly identified.
- IV. We will provide a stainless steel shelf for cafeteria drop off and for service area that is compliant at 34 inches.
- V. For shower areas the appropriate signage will be installed to direct to the accessible shower area.
- VI. Any patron that enters our building will be assigned personnel from the office to ensure their needs are met. This would include providing an escort to any area to direct them and/or serve as a companion to them throughout the event if needed.

***It is our understanding that certain facilities constructed pre 1977 are not held to the compliance standard. We will meet with contractors to propose possible solutions in the current non accessible areas to meet compliance as improvements to the building are made.

Estimated date of full completion of this plan will be August 31st of 2024

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Wed, Sep 4, 2024 at 9:43 AM

Subject: MOA Equity Review - Noncompliance Items

To: Lensch, Kreg <klensch@glidden-ralston.k12.ia.us>

Cc: toddkoehler@glidden-ralston.k12.ia.us <toddkoehler@glidden-ralston.k12.ia.us>, Heitz, Eric <eric.heitz@iowa.gov>, Wahlert, Tina <lina.wahlert@iowa.gov>

Dear Superintendent Lensch:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows three items requiring Glidden-Ralston Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 15, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 4, 2024, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

2324-2520-2 Parking

2324-2520-3 Passenger Loading Zones

2324-2520-4 Ramps

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Lensch at klensch@glidden-ralston.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educate.iowa.gov/pk-12/data/data-collections/casa>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

—
SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov

Website: <https://educateiowa.gov/>

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

December 4, 2024

Kreg Lensch
Superintendent
Glidden-Ralston Community School District
602 Idaho
Glidden, IA 51443Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items – Step Two Letter

Dear Superintendent Lensch,

This letter is in reference to previous email correspondence to the Glidden-Ralston Community School District (CSD) from the Iowa Department of Education (Department), on September 4, 2024, outlining three outstanding corrective actions for areas of equity noncompliance at the Glidden-Ralston Community School District's (CSD) middle and/or high school.

As of the date of this letter, the Department's Consolidated Accountability and Support Application (CASA) corrective action dashboard shows three corrective actions remain outstanding and require your district's immediate attention. These issues were originally brought to your attention in a Letter of Finding (LOF), dated September 15, 2023 (see attached), following an on-site equity review in spring 2023.

As you are already aware, it is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item immediately, as all previous deadlines and extensions have passed.

The current status of the following corrective actions in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-2520-2 Parking
- 2324-2520-3 Passenger Loading Zones
- 2324-2520-4 Ramps

The Department is unable to close the corrective actions until all requisite action steps outlined in CASA have been followed, including uploading photographic proof of completion. After all steps have been completed, update the status in CASA for each corrective action by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as

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ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Lensch at klensch@glidden-ralston.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educate.iowa.gov/media/3932/download?inline>.

Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,

Tina Wahlert

Division Administrator of PK-12 Learning
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: 515-326-0162
Email: Tina.Wahlert@iowa.gov

cc: Michael Schulze, Glidden-Ralston CSD Board President
Todd Koehler, Glidden-Ralston CSD Board Vice President
Andy Thielen, Glidden-Ralston CSD School Board Member
Brandon Squibb, Glidden-Ralston CSD School Board Member
Tyler Rohrbeck, Glidden-Ralston CSD School Board Member
SueAnn Johnson, Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Postville Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Tim Dugger, Superintendent
Postville Community School District
314 W Post Street
Postville, IA 52162

Dear Superintendent Dugger:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Postville Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Buffy Campbell, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

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School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by D staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Postville CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Postville CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 13.30 percent for CTE Concentrators.
- Indicator B: Postville CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 0.00 percent for CTE Concentrators.
- Indicator C: Postville CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 13.30 percent for CTE Concentrators.
- Indicator D: Postville CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 6.70 percent for CTE Concentrators.

If you have any questions, please contact Buffy Campbell at 515-954-8651 or buffy.campbell@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Buffy Campbell, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:51 AM

Subject: Equity Review Letter and Desk Audit

To: tdugger@postville.k12.ia.us <tdugger@postville.k12.ia.us>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Buffy Campbell <buffy.campbell@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Dugger:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162

tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 25, 2023

Brendan Knudtson
Superintendent
Postville Community School District
314 West Post Street
P.O. Box 717
Postville, Iowa 52162

Re: Iowa Department of Education Equity Review – Letter of Findings

Dear Superintendent Knudtson:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Postville Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because the Postville High School is the only school in the school district that offers CTE programs, it is the only school in Postville CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Postville CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Postville CSD for an equity review are as follows:

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Postville CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Postville CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Postville CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 13.3 percent for CTE Concentrators.
- Indicator B: Postville CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 0 percent for CTE Concentrators.
- Indicator C: Postville CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 13.33 percent for CTE Concentrators.
- Indicator D: Postville CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 6.67 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Postville CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights

requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Travis Koenig, Postville CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Buffy Campbell, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Dennis McClain, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Postville Community School District

Letter of Findings



September 25, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Postville CSD is published on the district website and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Recommendations:

- Update the annual notice CTE service area group names in board policy and all places that this notice is published. For a list of CTE service areas, see: [CTE Webpage, Iowa Department of Education](#)

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Postville CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Postville CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Postville CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.E4. Policy and related documents are easily found on the district website, under District – Board – Policies.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Postville CSD School Board policy number 102 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Postville CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills. The district provides information for families in their language of origin. Documentation included artifacts in both Spanish and Somalian.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented recruitment and promotional activities. Artifacts provided indicate that Postville CSD reviews course enrollment data annually to ensure that they are targeting areas of need.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Postville Community School District’s high school building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Postville Jr./Sr. High, 314 West Post Street, Postville, Iowa 52162

Building / Additions	Construction Year	Applicable Review Standard
Original construction	HS: 1940	Programs within facility must be readily accessible.
Addition	2010	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the high school building during the visit. The district must submit a written plan describing how the noncompliance areas noted will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are made available to students, staff, parents, and community members with disabilities. The compliance issues include:

Two additional (total) accessible parking stalls are needed within the Northeast and Southeast parking lots.

The building needs to address compliance issues within the toilet rooms and shower rooms, in regards to appropriate accessible and non-accessible signage. The shower rooms also need to address the inaccessible faucet handles and shower access.

The building needs to address compliance issues in regards to appropriate non-accessibility signage at doors around the building.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	The Southeast lot currently has 39 parking stalls and need to add 1 handicapped accessible stall. The Northeast lot currently has 20 parking stalls and need to add 1 handicapped accessible stall. All of the handicap accessible and van accessible stalls need signage with the international symbol of accessibility and/or van accessible signs.	ADA Standard 4.1.2(5)(b), 4.6.5 4.6.3	ADA Standard 4.1.2(5)(b), 4.6.5 4.6.3
Toilet Rooms	HS Lobby RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor. Gym Lobby RRs handicap accessible signs need to be moved to the appropriate location.	ADA Standard 4.1.6(3)(e); 4.30 4.1.3.(16)(a), 4.30	ADA Standard 4.1.6(3)(e), 4.30 4.1.3.(16)(a), 4.30
Shower Rooms	MS/HS Girls LR is not accessible, due to showers and faucet controls.	ADA Standard 4.21.5, 4.27.4	ADA Standard 4.21.5, 4.27.4
Entrances	Doors numbered 7, 10/11 (one sign), 12, 15, 17, and 18: Need signs indicating the nearest accessible entrance with arrows.	ADA Standard 4.1.3(8)(d), 4.30	ADA Standard 4.1.3(8)(d), 4.30

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Postville Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates school board policy 102.E3 is up to date and includes procedures to ensure services for students with disabilities are receiving an equitable education. It does not appear that the district has a Section 504 handbook or related forms for referral, evaluation or support services.

Recommendations:

- Consider contacting Keystone AEA Section 504 support staff for assistance in creating or updating the district Section 504 Handbook.

Required Corrective Action(s):

- Postville CSD will develop, review, and implement a handbook and policy to operationalize Section 504 in alignment with ADA requirements and district policy.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented strategies for student financial assistance. Artifacts provided did not indicate if individuals, agencies or organizations offering scholarships included the non-discrimination statement on their application materials.

Recommendations:

- Provide guidance to all agencies, organizations and individuals who offer scholarship opportunities regarding including the continuous non-discrimination statement in their application materials.
- If not currently doing so, consider working with agencies, organizations and individuals who offer scholarships support in translating application materials as may be necessary to ensure that students are provided application materials in their native language.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has numerous opportunities for students to engage in work-based learning, including a MOU with NICC, as well as partnerships with local businesses.

Recommendations:

- Postville CSD is advised to update their various work-based learning documents to ensure that the continuous notice of non-discrimination is included.
- While NICC as a community college also adheres to non-discrimination policies and practices, the Postville CSD is encouraged to work with NICC to ensure that the non-discrimination statement is included in the documents provided by NICC.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented strategies and school board policy 401.1, to ensure equity related to employment and personnel practices. District application materials include the appropriate statement of non-discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Postville CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Postville Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s)	Timeline for Completion
Name, Title				
M/D/Y				
III. Accessibility for Students with Disabilities				
<p>High School:</p> <p>Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Postville CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking – The Southeast lot currently has 39 parking</p>	<p>The southeast lot needs 1 more accessible parking stall.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>stalls and needs to add 1 accessible parking stall.</p> <p>The northeast lot currently has 20 parking stalls and needs to add 1 accessible parking stall.</p> <p>All of the accessible and van accessible stalls need signage with the international symbol of accessibility and/or van accessible signs.</p>	<p>The northeast lot needs 1 accessible parking stall.</p> <p>All van accessible parking stalls need signage that indicate they are van accessible.</p>			
<p>Toilet Rooms – HS Lobby RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p> <p>Gym Lobby RRs accessible signs need to be moved to the appropriate location.</p>	<p>HS Lobby RRs must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p> <p>Gym Lobby RRs accessible signs need to be moved to the appropriate location.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Shower Rooms – MS/HS Girls LR is not accessible, due to showers and faucet controls.</p>	<p>All MS and HS RRs need MS/HS Girls LR need to be made accessible and identified with appropriate signage or must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Entrances – Doors numbered 7, 10/11 (one sign), 12, 15, 17, and 18: Need signs indicating the nearest accessible entrance with arrows.	Doors numbered 7, 10/11 (one sign), 12, 15, 17, and 18: Need signs indicating the nearest accessible entrance with arrows.	Upload photo documentation to CASA (see instructions)		
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Signature of Superintendent

Date



September 25, 2023

Attachment A

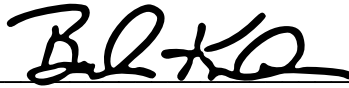
Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Postville Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y

<p>stalls and needs to add 1 accessible parking stall.</p> <p>The northeast lot currently has 20 parking stalls and needs to add 1 accessible parking stall.</p> <p>All of the accessible and van accessible stalls need signage with the international symbol of accessibility and/or van accessible signs.</p>	<p>The northeast lot needs 1 accessible parking stall.</p> <p>All van accessible parking stalls need signage that indicate they are van accessible.</p>		<p>Brendan Knudtson, Superintendent</p> <p>Glen Lansing, Director of Maintenance</p>	<p>December 31, 2023</p>
<p>Toilet Rooms – HS Lobby RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p> <p>Gym Lobby RRs accessible signs need to be moved to the appropriate location.</p>	<p>HS Lobby RRs must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p> <p>Gym Lobby RRs accessible signs need to be moved to the appropriate location.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Brendan Knudtson, Superintendent</p> <p>Glen Lansing, Director of Maintenance</p>	<p>December 31, 2023</p>
<p>Shower Rooms – MS/HS Girls LR is not accessible, due to showers and faucet controls.</p>	<p>All MS and HS RRs need MS/HS Girls LR need to be made accessible and identified with appropriate signage or must be identified by signage with directional arrows to accessible restrooms on the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Brendan Knudtson, Superintendent</p> <p>Glen Lansing, Director of Maintenance</p>	<p>December 31, 2023</p>

Entrances – Doors numbered 7, 10/11 (one sign), 12, 15, 17, and 18: Need signs indicating the nearest accessible entrance with arrows.	Doors numbered 7, 10/11 (one sign), 12, 15, 17, and 18: Need signs indicating the nearest accessible entrance with arrows.	Upload photo documentation to CASA (see instructions)	Brendan Knudtson, Superintendent Glen Lansing, Director of Maintenance	December 31, 2023
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Signature of Superintendent

October 4, 2023

Date

Spirit Lake Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

David Smith, Superintendent
Spirit Lake Community School District
2701 Hill Avenue
Spirit Lake, IA 51360

Dear Superintendent Smith:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Spirit Lake Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

Creating excellence in education through leadership and service

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Spirit Lake CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Spirit Lake CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 37.8 percent for CTE Concentrators.
- Indicator B: Spirit Lake CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 23.33 percent for CTE Concentrators.
- Indicator C: Spirit Lake CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 61.11 percent for CTE Concentrators.
- Indicator D: Spirit Lake CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 30.56 percent for CTE Concentrators.

If you have any questions, please contact Pam Spangler at 515-229-6425 or pam.spangler@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Pam Spangler, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:55 AM

Subject: Equity Review Letter and Desk Audit

To: dsmith@spirit-lake.k12.ia.us <dsmith@spirit-lake.k12.ia.us>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Smith:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162

tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 11, 2023

Mr. David Smith, Superintendent
Spirit Lake Community School District
2701 Hill Avenue
Spirit Lake, IA 51360Re: Iowa Department of Education Equity Review - Letter of Findings

Dear Superintendent Smith:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Spirit Lake Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Spirit Lake High School is the only school in the school district that offers CTE programs, it is the only school in Spirit Lake CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Spirit Lake CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Spirit Lake CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Spirit Lake CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Spirit Lake CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Spirit Lake CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 37.8 percent for CTE Concentrators.
- Indicator B: Spirit Lake CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 23.33 percent for CTE Concentrators.
- Indicator C: Spirit Lake CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 61.11 percent for CTE Concentrators.
- Indicator D: Spirit Lake CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 30.56 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Spirit Lake CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the

equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Teresa Beck, Spirit Lake CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Spirit Lake Community School District

Letter of Findings



September 11, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Spirit Lake CSD is published and contains career and technical education (CTE) programs. All required protected classes for educational programs are present except for “age” in the list of required notices.

Required Corrective Action(s):

- Spirit Lake CSD will correct the annual notice of nondiscrimination to include the protected class of “age” for educational programs.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Spirit Lake CSD does not include “marital status” in the first paragraph of Board Policy 102.E2 and the High School Handbook. The address of the Office of Civil Rights must be updated on page 21.

Recommendations:

- The address for the Office of Civil Rights may be included in the notice of nondiscrimination. The decision may be made by the district. Should the decision include keeping the Office for Civil Rights listed, the address is: Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education, John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email: OCR.Chicago@ed.gov

Required Corrective Action(s):

- Spirit Lake CSD will correct Board Policy 102.E2 and the High School Handbook to include the protected class of “marital status.”

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Spirit Lake CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Spirit Lake CSD has appropriately implemented and communicated the grievance procedures in school board policy number 401.3.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Spirit Lake CSD School Board policy number 502.10 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Spirit Lake CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Spirit Lake Community School District’s high school building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Spirit Lake, High School Building, 2701 Hill Avenue, Spirit Lake, Iowa 51360

Building / Additions	Construction Year	Applicable Review Standard
Original construction	HS: 1959	Programs within facility must be readily accessible.
Addition	HS: Various updates from 1990 - 2023	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the high school building during the visit. The district must submit a written plan describing how the noncompliance areas noted will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are made available to students, staff, parents, and community members with disabilities. The compliance issues include:

Two additional accessible stalls, and one van accessible parking stall are needed within the east side HS parking lot. Three additional accessible stalls are needed within the west side HS parking lot. One additional van accessible parking stall is needed within the auditorium parking lot.

The High School loading area needs to have the appropriate signage for accessible loading.

The High School needs to address compliance issues within the toilet rooms and shower rooms in regards to appropriate accessible and non-accessible signage and wrapping hot water pipes.

The High School needs to address compliance issues in regards to appropriate accessibility and non-accessibility entrances and doors around the building.

A written transition plan must be developed to address the accessibility concerns and compliance issues.

For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and

- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	<p>The East lot currently has 143 parking stalls with 3 handicapped accessible stalls, and zero van accessible stalls. This lot needs 6 total handicapped stalls, with at least 1 stall being van accessible.</p> <p>The West lot currently has 81 parking stalls with 1 handicapped accessible stall, and 1 van accessible stall. This lot needs 4 total handicapped stalls, with at least 1 stall being van accessible.</p> <p>The Southeast/Auditorium lot currently has 40 parking stalls with 4 handicapped accessible stalls, and zero van accessible stalls. This lot needs 2 total handicapped stalls, with at least 1 stall being van accessible.</p>	ADA Standard 4.1.2(5)(b), 4.6.5	ADA Standard 4.1.2(5)(b), 4.6.5
Passenger Loading Zones	Signage displaying international symbol of accessibility at the accessible loading zone at the HS is needed.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Toilet Rooms	<p>Schuhart boys and girls RRs, 4 corners RRs, and HS main office RR: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Schuhart boys and girls RRs and 4 corners RRs are inaccessible and must be identified by signage</p>	ADA Standard 4.19.4	ADA Standard 4.19.4

	with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.	ADA Standard 4.1.6(3)(e); 4.30	ADA Standard 4.1.6(3)(e), 4.30
Shower Rooms	HS FB locker room, Girls PE locker room, HS Boys locker room, Flex locker room, and Coaches locker rooms: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor. HS FB locker room, Girls PE locker room, HS Boys locker room, and Flex locker room: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.	ADA Standard 4.1.2(7)(d) ADA Standard 4.19.4	ADA Standard 4.1.2(7)(d) ADA Standard 4.19.4
Entrances	District Office entrance, Main HS entrance, and Auditorium Main entrance: Need to be identified by the international symbol of accessibility. Art doors, Senior Hall doors, West Commons doors, doors numbered 3-11, 13-15, and 21, 22, 32: Need signs indicating the nearest accessible entrance with arrows.	ADA Standard 4.1.2(7)(c), 4.30 ADA Standard 4.1.3(8)(d), 4.30	ADA Standard 4.1.2(7)(c), 4.30 ADA Standard 4.1.3(8)(d), 4.30

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Spirit Lake Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates school board policy 506.1 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The scholarship provided by Spirit Lake CSD should include the entire notice of nondiscrimination.

Recommendations:

- It is recommended that Spirit Lake CSD discuss with outside scholarship providers to add the nondiscrimination notice. This eliminates any bias in the awarding of financial assistance.

Required Corrective Action(s):

- Spirit Lake CSD will correct the Common Scholarship Application to include the notice of nondiscrimination in its entirety.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The district does not have a work study program, only job shadowing.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented strategies and school board policy 102, to ensure equity related to employment and personnel practices.
- The Equal Employment Opportunity (EEO) notice must be written out in its entirety at the bottom of the job application.
- School Board Policy 102 has the incorrect address of the Office for Civil Rights.

Recommendations:

- It is recommended that Spirit Lake CSD review all job applications to ensure that the notice of nondiscrimination is written in its entirety.
- The address for the Office of Civil Rights is not required. It is a district decision whether to include it.

Required Corrective Action(s):

- Spirit Lake CSD will correct the Equal Employment Opportunity notice to include the complete notice and the local contact information of the equity coordinator.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Spirit Lake CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 11, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Spirit Lake Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	All required protected classes for educational programs must be present except for “age” in the annual notice of nondiscrimination.	Evidence will include a corrected notice of nondiscrimination.		10/20/23
Continuous Notice of Nondiscrimination. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	The continuous notice provided by Spirit Lake CSD is missing marital status in the first paragraph of Board Policy 102.E2 and the High School Handbook. The address of the Office of Civil Rights must be updated on page 21.	Evidence will include a corrected board policy 102.E2 and the High School Handbook.		10/20/23
The information on honors, awards, and scholarships	The Common Scholarship application	Evidence will include a corrected application of		10/20/23

<p>are available to all persons regardless of race, color, national origin, sex or disability. OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37</p>	<p>provided as evidence was missing the notice of nondiscrimination in its entirety. This would include the written notice and completed contact information.</p>	<p>the Common Scholarship.</p>		
<p>III. Accessibility for Students with Disabilities</p>				
<p>High School: Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Spirit Lake CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>The East lot currently has 143 parking stalls with 3 accessible stalls, and zero van accessible stalls. This lot needs 6 total accessible stalls, with at least 1 stall being van accessible. The West lot currently has 81 parking stalls with 1 accessible stall, and 1 van</p>	<p>East lot needs 6 total accessible stalls, with at least 1 stall being van accessible. West lot needs 4 total accessible stalls, with at least 1 stall being van accessible.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>accessible stall. This lot needs 4 total accessible stalls, with at least 1 stall being van accessible.</p> <p>The Southeast/Auditorium lot currently has 40 parking stalls with 4 accessible stalls, and zero van accessible stalls. This lot needs 2 total accessible stalls, with at least 1 stall being van accessible.</p>	<p>Southeast/Auditorium lot needs 2 total accessible stalls, with at least 1 stall being van accessible.</p>			
<p>Signage displaying international symbol of accessibility at the HS accessible loading zone is needed.</p>	<p>Need to place signage displaying international symbol of accessibility at the HS accessible loading zone.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Schuhart boys and girls RRs, 4 corners RRs, and HS main office RR: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Schuhart boys and girls RRs and 4 corners RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p>	<p>Schuhart boys and girls RRs, 4 corners RRs, and HS main office RR: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Schuhart boys and girls RRs and 4 corners RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

	side of the door, and 60 inches above the floor.			
<p>HS FB locker room, Girls PE locker room, HS Boys locker room, Flex locker room, and Coaches locker rooms are accessible shower rooms and need to be identified with signage with international symbol of accessibility with braille on the latch side of the door, and 60 inches above the floor.</p> <p>HS FB locker room, Girls PE locker room, HS Boys locker room, and Flex locker room: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p>	<p>HS FB locker room, Girls PE locker room, HS Boys locker room, Flex locker room, and Coaches locker rooms need to be identified with signage with international symbol of accessibility with braille on the latch side of the door, and 60 inches above the floor.</p> <p>HS FB locker room, Girls PE locker room, HS Boys locker room, and Flex locker room: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>District Office entrance, Main HS entrance, and Auditorium Main entrance: Needs to be identified with signage with the international symbol of accessibility.</p> <p>Art doors, Senior Hall doors, West Commons doors, doors numbered 3-11, 13-</p>	<p>District Office entrance, Main HS entrance, and Auditorium Main entrance: Needs to be identified with signage with the international symbol of accessibility.</p> <p>Art doors, Senior Hall doors, West Commons doors, doors numbered</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

15, and 21, 22, 32: Need signs with directional arrows indicating the nearest accessible entrance.	3-11, 13-15, and 21, 22, 32: Need signs with directional arrows indicating the nearest accessible entrance.			
VIII. Employment				
OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	The job application submitted must include an Equal Employment Opportunity notice and contact information in its entirety.	Evidence will include the corrected job application.		10/20/23

Signature of Superintendent

Date



September 11, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Spirit Lake Community School District

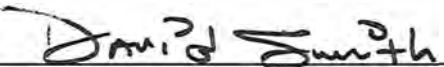
Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	All required protected classes for educational programs must be present except for “age” in the annual notice of nondiscrimination.	Evidence will include a corrected notice of nondiscrimination.	Angela Olsen, District Office Support & Special Projects	10/20/23 Completed on 10/9/23
Continuous Notice of Nondiscrimination. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	The continuous notice provided by Spirit Lake CSD is missing marital status in the first paragraph of Board Policy 102.E2 and the High School Handbook. The address of the Office of Civil Rights must be updated on page 21.	Evidence will include a corrected board policy 102.E2 and the High School Handbook.	Angela Olsen, District Office Support & Special Projects	10/20/23 Completed on 10/9/23
The information on honors, awards, and scholarships	The Common Scholarship application	Evidence will include a corrected application of		10/20/23

<p>are available to all persons regardless of race, color, national origin, sex or disability. OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37</p>	<p>provided as evidence was missing the notice of nondiscrimination in its entirety. This would include the written notice and completed contact information.</p>	<p>the Common Scholarship.</p>	<p>Angela Olsen, District Office Support and Special Projects</p>	<p>Completed on 10/9/23</p>
<p>III. Accessibility for Students with Disabilities</p>				
<p>High School: Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Spirit Lake CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>	<p>Angela Olsen, District Office Support and Special Projects</p>	<p>To be completed by 12/1/2023</p>
<p>The East lot currently has 143 parking stalls with 3 accessible stalls, and zero van accessible stalls. This lot needs 6 total accessible stalls, with at least 1 stall being van accessible. The West lot currently has 81 parking stalls with 1 accessible stall, and 1 van</p>	<p>East lot needs 6 total accessible stalls, with at least 1 stall being van accessible. West lot needs 4 total accessible stalls, with at least 1 stall being van accessible.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>David Dau, Director of Operations & Angela Olsen, District Office Support & Special Projects</p>	<p>East Lot - Completed as of 8/24/2023 & 9/30/2023 West lot - completed on 9/30/2023 SE/Auditorium Lot completed on 9/30/2023</p>

<p>accessible stall. This lot needs 4 total accessible stalls, with at least 1 stall being van accessible.</p> <p>The Southeast/Auditorium lot currently has 40 parking stalls with 4 accessible stalls, and zero van accessible stalls. This lot needs 2 total accessible stalls, with at least 1 stall being van accessible.</p>	<p>Southeast/Auditorium lot needs 2 total accessible stalls, with at least 1 stall being van accessible.</p>			
<p>Signage displaying international symbol of accessibility at the HS accessible loading zone is needed.</p>	<p>Need to place signage displaying international symbol of accessibility at the HS accessible loading zone.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>David Dau, Director of Operations & Angela Olsen, District Office Support/Special Projects</p>	<p>Completion by December 21, 2023</p>
<p>Schuhart boys and girls RRs, 4 corners RRs, and HS main office RR: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Schuhart boys and girls RRs and 4 corners RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch side of the door, and 60 inches above the floor.</p>	<p>Schuhart boys and girls RRs, 4 corners RRs, and HS main office RR: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Schuhart boys and girls RRs and 4 corners RRs are inaccessible and must be identified by signage with directional arrows to accessible restrooms. On the latch</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>David Dau, Director of Operations, Parker Jungjohan, Maintenance & Angela Olsen, District Office Support/Special Projects</p>	<p>Completion by August 1, 2024</p>

	side of the door, and 60 inches above the floor.			
<p>HS FB locker room, Girls PE locker room, HS Boys locker room, Flex locker room, and Coaches locker rooms are accessible shower rooms and need to be identified with signage with international symbol of accessibility with braille on the latch side of the door, and 60 inches above the floor.</p> <p>HS FB locker room, Girls PE locker room, HS Boys locker room, and Flex locker room: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p>	<p>HS FB locker room, Girls PE locker room, HS Boys locker room, Flex locker room, and Coaches locker rooms need to be identified with signage with international symbol of accessibility with braille on the latch side of the door, and 60 inches above the floor.</p> <p>HS FB locker room, Girls PE locker room, HS Boys locker room, and Flex locker room: hot water pipes and drain pipes under the sinks in the accessible toilet room must be insulated or configured to avoid contact with the legs of a person using a wheelchair.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>David Dau, Director of Operations, Parker Jungjohan, Maintenance & Angela Olsen, District Office Support/Special Projects</p>	<p>Completion by August 1, 2024</p>
<p>District Office entrance, Main HS entrance, and Auditorium Main entrance: Needs to be identified with signage with the international symbol of accessibility.</p> <p>Art doors, Senior Hall doors, West Commons doors, doors numbered 3-11, 13-</p>	<p>District Office entrance, Main HS entrance, and Auditorium Main entrance: Needs to be identified with signage with the international symbol of accessibility.</p> <p>Art doors, Senior Hall doors, West Commons doors, doors numbered</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>David Dau, Director of Operations, Chad Wheatley, Maintenance & Angela Olsen, District Office Support/Special Projects</p>	<p>Completion by August 1, 2024</p>

15, and 21, 22, 32: Need signs with directional arrows indicating the nearest accessible entrance.	3-11, 13-15, and 21, 22, 32: Need signs with directional arrows indicating the nearest accessible entrance.			
VIII. Employment				
OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	The job application submitted must include an Equal Employment Opportunity notice and contact information in its entirety.	Evidence will include the corrected job application.	Angela Olsen, District Office Support & Special Projects	10/20/23 Completed 10/16/2023



 Signature of Superintendent

10/17/23

 Date

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

February 5, 2024

Mr. David Smith, Superintendent
Spirit Lake Community School District
2701 Hill Avenue
Spirit Lake, IA 51360Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items

Dear Superintendent Smith:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows two items requiring Spirit Lake Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 11, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, February 23, 2023, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-6120-6 Parking
- 2324-6120-7 Signage

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Smith at dsmith@spirit-lake.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

Creating excellence in education through leadership and service

Administrative Consultant – Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Ph: (515) 336-3942
E: sueann.johnson@iowa.gov

cc: Ashley Weber, Spirit Lake CSD Equity Coordinator
Tina Wahlert, Bureau Chief – School Improvement
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Feb 5, 2024 at 12:21 PM

Subject: MOA Equity Review - Noncompliance Items

To: <dsmith@spirit-lake.k12.ia.us>

Cc: aweber@spiritleakecsd.org <aweber@spiritleakecsd.org>, Wahlert, Tina <tina.wahlert@iowa.gov>, Kimberly Buryanek <kim.buryanek@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>

Dear Superintendent Smith:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows two items requiring Spirit Lake Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 11, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, February 23, 2023, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-6120-6 Parking
- 2324-6120-7 Signage

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Smith at dsmith@spirit-lake.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

March 4, 2024

Mr. David Smith
Superintendent
Spirit Lake Community School District
2701 Hill Avenue
Spirit Lake, IA 51360

Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items – Step Two Letter

Dear Superintendent Smith,

This letter is in reference to previous correspondence to the Spirit Lake Community School District (CSD) from the Iowa Department of Education (Department), dated February 5, 2024, outlining two outstanding corrective actions for areas of equity noncompliance at the Spirit Lake CSD middle and/or high school.

As of the date of this letter, the Department's Consolidated Accountability and Support Application (CASA) corrective action dashboard shows one corrective action remains outstanding and requires your district's immediate attention. This issue was originally brought to your attention in a Letter of Finding (LOF), dated September 11, 2023, following an on-site equity review in spring 2023.

As you are already aware, it is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item immediately, as all previous deadlines and extensions have passed.

The current status of the following corrective action (equity) in CASA is **Action Overdue**. This indicates that the required action step(s) have not been completed.

- 2324-6120-7 Signage

The Department is unable to close the corrective action until all requisite action steps outlined in CASA have been followed, including uploading photographic proof of completion. After all steps have been completed, update the status in CASA for each corrective action by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Smith at dsmith@spirit-lake.k12.ia.us. The corrective action will then be

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closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,

Tina Wahlert

Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: 515-326-0162
Email: Tina.Wahlert@iowa.gov

cc: Teresa Beck, Spirit Lake CSD School Board President
Sonja Hamm, Spirit Lake CSD School Board Vice President
Greta Gruys, Spirit Lake CSD School Board Director
Jeromy Mouw, Spirit Lake CSD School Board Director
Mieka Stecker, Spirit Lake CSD School Board Director
Ashley Weber, Spirit Lake CSD Equity Coordinator
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Administrative Consultant, Equity Compliance, School Improvement
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Springville Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Autumn Pino, Superintendent
Springville Community School District
602 Mill Avenue
Springville, IA 52336

Dear Superintendent Pino:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Springville Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Marietta Rives, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA Visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

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School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing and signing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive a focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Springville CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Springville CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 40.8 percent for CTE Concentrators.
- Indicator B: Springville CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 20.42 percent for CTE Concentrators.
- Indicator C: Springville CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 61.25 percent for CTE Concentrators.
- Indicator D: Springville CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 30.63 percent for CTE Concentrators.

If you have any questions, please contact Marietta Rives at 515-360-5131 or marietta.rives@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Marietta Rives, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 11:58 AM

Subject: Equity Review Letter and Desk Audit

To: apino@springville.k12.ia.us <apino@springville.k12.ia.us>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Marietta Rives <marietta.rives@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Pino:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162

tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 18, 2023

Autumn Pino, Superintendent
Springville Community School District
602 Mill Avenue
Springville, IA 52336Re: Iowa Department of Education Equity Review - Letter of Findings

Dear Superintendent Pino:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Springville Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Springville CSD's secondary building (grades 7-12) is the only school in the school district that offers CTE programs, it is the only school in Springville CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Springville CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Springville CSD for an equity review are as follows:

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Springville CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Springville CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Springville CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 40.8 percent for CTE Concentrators.
- Indicator B: Springville CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 20.42 percent for CTE Concentrators.
- Indicator C: Springville CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 61.25 percent for CTE Concentrators.
- Indicator D: Springville CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 30.63 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Springville CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the

equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kate O'Brien-May, Springville CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Marietta Rives, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Springville Community School District
Letter of Findings



September 18, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Springville CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Springville CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Springville CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Recommendations:

- The school district should take steps to formalize the roles, responsibilities and functions of the Equity Coordinator specific to your setting. In addition, consider ways to provide training for the equity coordinator and include that information in any documents designed to frame and communicate the role. Guidance for the equity coordinator's role, responsibilities and functions can be found on the Department's website: [2019-2020 Equity Coordinator Responsibilities Checklist](#)

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Springville CSD has appropriately implemented and communicated the grievance procedures in school board policy number 104.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Springville CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Springville CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Recommendations:

- It is recommended that the district create and publish a timeline of college and career planning activities that students are engaged in.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Springville Community School District’s secondary building (grades 7-12) was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Springville, Secondary School Building, 400 Academy St., Springville, Iowa 52336

Building / Additions	Construction Year	Applicable Review Standard
Original construction	HS: 2015	Programs within facility must be readily accessible.
Addition	--	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the high school building during the visit. The district must submit a written plan describing how the noncompliance areas noted will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are made available to students, staff, parents, and community members with disabilities. The compliance issues include:

The High School loading area needs to have the appropriate signage for accessible loading.

The High School needs to address compliance issues within the toilet rooms and shower rooms, in regards to appropriate accessible signage and wrapping hot water pipes.

The High School needs to address compliance issues in regards to appropriate accessibility and non-accessibility entrances and doors around the building.

A written transition plan must be developed to address the accessibility concerns and compliance issues.

For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Passenger Loading Zones	Signage displaying international symbol of accessibility at the accessible loading zone at the HS is needed.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Toilet Rooms	3 rd Floor and Main Boys and Girls RRs off the Gym: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair. Elevator Hallway Boys and Girls RRs are accessible and must be identified by the appropriate tactile signage. On the latch side of the door, and 60 inches above the floor.	ADA Standard 4.19.4 4.1.3(16)(a); 4.30	ADA Standard 4.19.4 4.1.3(16)(a), 4.30
Shower Rooms	MS/HS locker rooms: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor. MS/HS locker rooms: need to replace faucet handles with level style handles.	ADA Standard 4.1.2(7)(d) 4.21.5, 4.27.4	ADA Standard 4.1.2(7)(d) 4.21.5, 4.27.4
Entrances	Main HS entrance, and Main Elementary entrances: Need to be identified by the international symbol of accessibility.	ADA Standard 4.1.2(7)(c), 4.30	ADA Standard 4.1.2(7)(c), 4.30

	Various doors around the building: Need signs indicating the nearest accessible entrance with arrows.	ADA Standard 4.1.3(8)(d), 4.30	ADA Standard 4.1.3(8)(d), 4.30
Elevator	Elevator call buttons need to be ¾ inches wide and centered at 42 inches.	ADA Standard 4.10.3	ADA Standard 4.10.3
	Hall call buttons need visual signals to indicate when each call is registered or unanswered.	4.10.3	4.10.3

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Springville Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates school board policy 102 and Section 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district is working to ensure student workplace experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented strategies and school board policy 401, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Springville CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 18, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Springville Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School: Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Springville CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Passenger Loading Zones – Signage displaying international symbol of</p>	<p>Signage displaying international symbol of accessibility at the</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>accessibility at the accessible loading zone at the HS is lacking.</p>	<p>accessible loading zone at the HS is needed.</p>			
<p>Toilet Rooms – 3rd Floor and Main Boys and Girls RRs off the Gym: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Elevator Hallway Boys and Girls RRs are accessible and must be identified by the appropriate tactile signage on the latch side of the door, and 60 inches above the floor.</p>	<p>3rd Floor and Main Boys and Girls RRs off the Gym: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Elevator Hallway Boys and Girls RRs must be identified by the appropriate tactile signage on the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Shower Rooms – MS/HS locker rooms: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>MS/HS locker rooms: need to replace faucet handles with level style handles.</p>	<p>MS/HS locker rooms: need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>MS/HS locker rooms: need to replace faucet handles with level style handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Entrances – Main HS entrance, and Main Elementary entrances: Need to be identified by the</p>	<p>Main HS entrance, and Main Elementary entrances: Need to be identified by the</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>international symbol of accessibility.</p> <p>Various doors around the building: Need signs indicating the nearest accessible entrance with arrows.</p>	<p>international symbol of accessibility.</p> <p>Various doors around the building: Need signs indicating the nearest accessible entrance with arrows.</p>			
<p>Elevator – Call buttons need to be $\frac{3}{4}$ inches wide and centered at 42 inches.</p> <p>Hall call buttons need visual signals to indicate when each call is registered or unanswered.</p>	<p>Elevator call buttons need to be $\frac{3}{4}$ inches wide and centered at 42 inches.</p> <p>Hall call buttons need visual signals to indicate when each call is registered or unanswered.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date



September 18, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Springville Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
<p>High School:</p> <p>Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Springville CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>	<p><i>Autumn Puno</i> <i>Superintendent</i> <i>Springville CSD</i></p> <p><i>Nick Merritt</i> <i>Secondary Principal</i> <i>Springville CSD</i></p>	<p><i>11/23/23</i></p>
<p>Passenger Loading Zones – Signage displaying international symbol of</p>	<p>Signage displaying international symbol of accessibility at the</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p><i>Autumn Puno</i> <i>Superintendent</i></p>	<p><i>Completed, Pictures to be</i></p>

<p>accessibility at the accessible loading zone at the HS is lacking.</p>	<p>accessible loading zone at the HS is needed.</p>		<p>Jeff Baych Director of Buildings & Grounds</p>	<p>uploaded by 11/28/23</p>
<p>Toilet Rooms – 3rd Floor and Main Boys and Girls RRs off the Gym: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Elevator Hallway Boys and Girls RRs are accessible and must be identified by the appropriate tactile signage on the latch side of the door, and 60 inches above the floor.</p>	<p>3rd Floor and Main Boys and Girls RRs off the Gym: hot water pipes and drain pipes under the sinks in the accessible toilet room insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>Elevator Hallway Boys and Girls RRs must be identified by the appropriate tactile signage on the latch side of the door, and 60 inches above the floor.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Autumn Piri Superintendent</p> <p>Jeff Baych Director of Buildings & Grounds</p>	<p>3rd floor completely waiting on parts</p> <p>12/1/23</p> <hr/> <p>Completed, upload pictures by 12/1/23</p>
<p>Shower Rooms – MS/HS locker rooms: are accessible shower rooms and need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>MS/HS locker rooms: need to replace faucet handles with level style handles.</p>	<p>MS/HS locker rooms: need to be identified by international symbol of accessibility signs with brail. On the latch side of the door, and 60 inches above the floor.</p> <p>MS/HS locker rooms: need to replace faucet handles with level style handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Baych Director of Buildings & Grounds</p> <p>Autumn Piri Superintendent</p>	<p>Complete by 12/1/23</p>
<p>Entrances – Main HS entrance, and Main Elementary entrances: Need to be identified by the</p>	<p>Main HS entrance, and Main Elementary entrances: Need to be identified by the</p>	<p>Upload photo documentation to CASA (see instructions)</p>		<p>Completed, upload pictures by 12/1/23</p>

<p>international symbol of accessibility.</p> <p>Various doors around the building: Need signs indicating the nearest accessible entrance with arrows.</p>	<p>international symbol of accessibility.</p> <p>Various doors around the building: Need signs indicating the nearest accessible entrance with arrows.</p>			<p>12/1/23</p>
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Andrew P.
Signature of Superintendent

10/30/23
Date

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

February 5, 2024

Autumn Pino, Superintendent
Springville Community School District
602 Mill Avenue
Springville, IA 52336Re: Iowa Department of Education Methods of Administration (MOA) Equity Review – Noncompliance Items

Dear Superintendent Pino:

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows two items requiring Springville Community School District's (CSD) immediate attention. As you are aware from the Letter of Finding (LOF) dated September 18, 2023, it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, February 23, 2024, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed.

- 2324-6138-4 Shower Rooms
- 2324-6138-6 Elevator

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Pino at apino@springville.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

Creating excellence in education through leadership and service

Administrative Consultant – Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Ph: (515) 336-3942
E: sueann.johnson@iowa.gov

cc: Tina Wahlert, Bureau Chief – School Improvement
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning
and Results
Eric Heitz, Iowa Department of Education Administrative Consultant, School
Improvement Bureau
Marietta Rives, Iowa Department of Education School Improvement Consultant, School
Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School
Finance, Bureau of School Business Operations

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Feb 5, 2024 at 12:28 PM

Subject: MOA Equity Review - Noncompliance Items

To: Autumn Pino <apino@springville.k12.ia.us>

Cc: Wahlert, Tina <tina.wahlert@iowa.gov>, Kimberly Buryanek <kim.buryanek@iowa.gov>, Heitz, Eric <enc.heitz@iowa.gov>, Marietta Rives <marietta.rives@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>

Dear Superintendent Pino:

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Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

—
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>

Storm Lake Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Stacey Cole, Superintendent
Storm Lake Community School District
419 Lake Avenue
Storm Lake, IA 50588

Dear Superintendent Cole:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Storm Lake Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

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School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which school districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Storm Lake CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Storm Lake CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 27.9 percent for CTE Concentrators.
- Indicator B: Storm Lake CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 20.53 percent for CTE Concentrators.
- Indicator C: Storm Lake CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 48.47 percent for CTE Concentrators.
- Indicator D: Storm Lake CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 24.23 percent for CTE Concentrators.

If you have any questions, please contact Pam Spangler at 515-229-6425 or pam.spangler@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Pam Spangler, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Thu, Apr 6, 2023 at 12:01 PM

Subject: Equity Review Letter and Desk Audit

To: scole@slcsd.org <scole@slcsd.org>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Cole:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm



IOWA

Department of Education

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

July 21, 2023

Stacey Cole, Superintendent
Storm Lake Community School District
419 Lake Avenue
Storm Lake, IA 50588

Re: Iowa Department of Education Equity Review - Letter of Findings

Dear Superintendent Cole:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Storm Lake Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (federal department). Because Storm Lake High School is the only school in the school district that offers CTE programs, it is the only school in Storm Lake CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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Phone (515) 281-5294 | www.educateiowa.gov

Storm Lake CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Storm Lake CSD for an equity review are as follows:

Storm Lake CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Storm Lake CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Storm Lake CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 27.9 percent for CTE Concentrators.
- Indicator B: Storm Lake CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 20.53 percent for CTE Concentrators.
- Indicator C: Storm Lake CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 48.47 percent for CTE Concentrators.
- Indicator D: Storm Lake CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 24.23 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Storm Lake CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The federal department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or tina.wahlert@iowa.gov, or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942 or sueann.johnson@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

Cc: David Skibsted, President, Storm Lake Community School District Board of Education
Dr. Kimberly Buryanek, Administrator, Division of Learning and Results
SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

Pam Spangler, Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Storm Lake Community School District

Letter of Findings



July 21, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Storm Lake CSD is published and contains career and technical education (CTE) programs, and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Storm Lake CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Storm Lake CSD has not appropriately designated an equity coordinator, and has not communicated the role and duties to staff, students and community members.

Required Corrective Action(s):

- The Storm Lake CSD Board of Directors is required to annually appoint an Equity Coordinator. Evidence of this will be shown through board agendas and minutes.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Storm Lake CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.R1.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Storm Lake CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Storm Lake CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Storm Lake Community School District's high school and middle school buildings were reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Storm Lake, High School Building, 621 Tornado Drive, Storm Lake, Iowa 50588
Storm Lake, Middle School Building, 1811 Hyland Drive, Storm Lake, Iowa 50588

Building / Additions	Construction Year	Applicable Review Standard
Original construction	HS: 1962 MS: 1990	Programs within facility must be readily accessible.
Addition	HS: 2014 (updated Bldg.) MS: 2019 (Gym)	2010 ADA Standards

Some non-compliance with ADA accessibility was identified at the high school and middle school buildings during the visit. The district must submit a written plan describing how the noncompliance areas identified will be, or have been, made compliant. In the case where an issue cannot be made compliant, the district must submit a written plan for how the programs and services in each building that are inaccessible are being made available to students, staff, parents, and community members with disabilities. The noncompliance issues include:

Two additional Van Accessible parking stalls are needed within the east side HS parking lot. Both MS and HS buildings need to address compliance issues within the toilet rooms and shower rooms, as well as accessible door handles in MS assembly areas and classrooms. The MS also needs to address a non-accessible tray slide in the lunchroom.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of Non-Compliance	Compliance Issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	The NE and SE combined HS lots need to add two (2) Van Accessible Handicapped parking stalls with appropriate signage.	ADA Standard 4.1.2(5)(b), 4.6.5	ADA Standard 4.1.2(5)(b), 4.6.5

Passenger Loading Zones	Signage displaying international symbol of accessibility at the accessible loading zone at both the MS and HS.	ADA Standard 4.1.2(7)(b)	ADA Standard 4.1.2(7)(b)
Rooms and Spaces	HS Industrial Technology classroom door knob cannot be accessed without twisting your wrist.	ADA Standard 4.13.9	ADA Standard 4.13.9
Toilet Rooms (and 1 Shower Room)	<p>MS Main B&G RR, IT unisex RR, Special Education rooms 201 and 206, and MS PE B&G LR: hot water pipes and drain pipes under the sinks in the accessible toilet room are not insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>HS RR known as IC RR must be identified by the international symbol of accessibility. Tactile signage identifying the restrooms on the latch side of the door and 60 inches above the floor.</p> <p>HS IC RR, MS Staff RR, and MS IT Unisex RR: Grab bars need to be installed in the accessible toilet rooms.</p>	<p>ADA Standard 4.19.4</p> <p>ADA Standard 4.1.3(16)(a); 4.30</p> <p>ADA Standard 4.17.6; 4.26</p>	<p>ADA Standard 4.19.4</p> <p>ADA Standard 4.1.3(16)(a), 4.30</p> <p>ADA Standard 4.17.6; 4.26</p>
Shower Rooms	<p>HS Wr. LR, Girls Athletic LR, Girls PE LR, and Boys PE LR: non-accessible shower rooms need to be identified by international symbol of accessibility with arrows to accessible shower rooms.</p> <p>OR</p> <p>These same LRs can become accessible by lowering the shower controls (making a shower accessible in each LR) and replacing round door knobs with accessible door handles.</p>	<p>ADA Standard 4.1.2(7)(d)</p> <p>ADA Standard 4.23.2; 4.13.11; 4.13.9</p>	<p>ADA Standard 4.1.2(7)(d)</p> <p>ADA Standard 4.23.2; 4.13.11, 4.13.9</p>
Assembly Areas	MS Office and MS Nurses Office need to have round door knobs replaced with accessible door handles.	ADA Standard 4.13.11	ADA Standard 4.13.11

Cafeteria	MS cafeteria tray return is 35 inches high, and needs to be no more than 34 inches high.	ADA Standard 5.5	ADA Standard 5.5
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IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

Storm Lake Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

None noted.

Recommendations:

None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates school board policy number 102.R3 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Recommendations:

- It is recommended that the district communicate with scholarship providers in adding the notice of nondiscrimination to scholarship information to prevent any bias.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district is working to ensure student workplace experiences are free of discrimination.

Recommendations:

- It is recommended that the district work with Kristy Voleski, Work-Based Learning Consultant at the Iowa Department of Education. There are some parallels between work experience and work-based learning in which there are concerns of student safety along with limited contracting between the high school and workplace.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. **Employment**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented strategies and school board policy 401.1, to ensure equity related to employment and personnel practices.
- All job postings must have the entire notice of nondiscrimination posted at the bottom of the page, including the contact information of the equity coordinator.

Required Corrective Action(s):

- The district will correct all job postings to ensure that the notice of nondiscrimination is posted in its entirety.

B. **Salary**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Storm Lake CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



July 21, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Storm Lake Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Appointment of Equity Coordinator and summary of coordinator activities. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	The Storm Lake CSD Board of Directors is required to annually appoint an Equity Coordinator. Evidence of this will be shown through board agendas and minutes. Once appointed, please notify the Iowa Department of Education Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov	Evidence of this will be shown through current school board minutes.		9/15/2023
Documentation of employment practices including screening/hiring policies and procedures. OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	All job postings must have the entire notice of nondiscrimination posted at the bottom of the page, including the contact information of the equity coordinator.	Evidence of this will include Samples of job postings over the past three years; Employment application forms for licensed and unlicensed staff; and a Personnel Hiring Manual		9/15/2023

III. Accessibility for Students with Disabilities				
<p>Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Storm Lake CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking - The NE and SE combined HS lots need to add two (2) Van Accessible Handicapped parking stalls with appropriate signage.</p>	<p>NE and SE combined HS lots need to add two (2) Van Accessible Handicapped parking stalls, with appropriate signage.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Passenger Loading Zones - Signage displaying international symbol of accessibility at the accessible loading zone at both the MS and HS.</p>	<p>MS and HS both need signage displaying international symbol of accessibility at the accessible loading zones.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>Rooms and Spaces - HS Industrial Technology classroom door knob cannot be accessed without twisting your wrist.</p>	<p>HS Industrial Technology classroom needs new accessible door knob.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Toilet Rooms (and 1 Shower Room) - MS Main B&G RR, IT unisex RR, Special Education rooms 201 and 206, and MS PE B&G LR: hot water pipes and drain pipes under the sinks in the accessible toilet room are not insulated or configured to avoid contact with the legs of a person using a wheelchair.</p> <p>HS RR (known as IC RR) must be identified by the international symbol of accessibility. Tactile signage identifying the restrooms on the latch side of the door and 60 inches above the floor.</p> <p>HS IC RR, MS Staff RR, and MS IT Unisex RR: Grab bars need to be installed in the accessible toilet rooms.</p>	<p>MS Main B&G RR, IT unisex RR, Special Education rooms 201 and 206, and MS PE B&G LR: Need to insulate hot water pipes and drain pipes under the sinks in the accessible toilet room. Alternatively, the pipes must be configured to avoid contact with the legs of a person using a wheelchair.</p> <p>HS RR (known as IC RR) must be identified by the international symbol of accessibility with tactile signage identifying the restrooms on the latch side of the door and 60 inches above the floor.</p> <p>HS IC RR, MS Staff RR, and MS IT Unisex RR: Grab bars need to be installed in the accessible toilet rooms.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>Shower Rooms - HS Wr. LR, Girls Athletic LR, Girls PE LR, and Boys PE LR: non-accessible shower rooms need to be identified by international symbol of accessibility with arrows to accessible shower rooms.</p> <p>OR</p> <p>These same LRs can become accessible by lowering the shower controls (making a shower accessible in each LR) and replacing round door knobs with accessible door handles.</p>	<p>HS Wr. LR, Girls Athletic LR, Girls PE LR, and Boys PE LR: Non-accessible shower rooms must be identified by international symbol of accessibility with arrows to accessible shower rooms.</p> <p>OR</p> <p>These same LRs can become accessible by lowering the shower controls (making a shower accessible in each LR), and replacing round door knobs with accessible door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Assembly Areas - MS Office and MS Nurses Office need to have round door knobs replaced with accessible door handles.</p>	<p>MS Office and MS Nurses Office: Round door knobs need to be replaced with accessible door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Cafeteria - MS cafeteria tray return is 35 inches high, and needs to be no more than 34 inches high.</p>	<p>MS cafeteria tray return must be no more than 34 inches high.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date



July 21, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Storm Lake Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Appointment of Equity Coordinator and summary of coordinator activities. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	The Storm Lake CSD Board of Directors is required to annually appoint an Equity Coordinator. Evidence of this will be shown through board agendas and minutes. Once appointed, please notify the Iowa Department of Education Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov	Evidence of this will be shown through current school board minutes.	School Board Appointment	9/15/2023
Documentation of employment practices including screening/hiring policies and procedures. OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	All job postings must have the entire notice of nondiscrimination posted at the bottom of the page, including the contact information of the equity coordinator.	Evidence of this will include Samples of job postings over the past three years; Employment application forms for licensed and unlicensed staff; and a Personnel Hiring Manual	Kellie Anderson Equity Coordinator	9/15/2023

III. Accessibility for Students with Disabilities				
<p>Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>The Storm Lake CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of the high school or middle school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>	<p>Kellie Anderson Equity Coordinator</p> <p>Jeff Tollefson, Chief Operating Officer</p>	<p>Aug 31-2023</p>
<p>Parking - The NE and SE combined HS lots need to add two (2) Van Accessible Handicapped parking stalls with appropriate signage.</p>	<p>NE and SE combined HS lots need to add two (2) Van Accessible Handicapped parking stalls, with appropriate signage.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Tollefson, COO</p>	<p>October 6, 2023</p>
<p>Passenger Loading Zones - Signage displaying international symbol of accessibility at the accessible loading zone at both the MS and HS.</p>	<p>MS and HS both need signage displaying international symbol of accessibility at the accessible loading zones.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Tollefson</p>	<p>October 6, 2023</p>

<p>Shower Rooms - HS Wr. LR, Girls Athletic LR, Girls PE LR, and Boys PE LR: non-accessible shower rooms need to be identified by international symbol of accessibility with arrows to accessible shower rooms.</p> <p>OR</p> <p>These same LRs can become accessible by lowering the shower controls (making a shower accessible in each LR) and replacing round door knobs with accessible door handles.</p>	<p>HS Wr. LR, Girls Athletic LR, Girls PE LR, and Boys PE LR: Non-accessible shower rooms must be identified by international symbol of accessibility with arrows to accessible shower rooms.</p> <p>OR</p> <p>These same LRs can become accessible by lowering the shower controls (making a shower accessible in each LR), and replacing round door knobs with accessible door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Tollefson, cco</p>	<p>September 30, 2023</p>
<p>Assembly Areas - MS Office and MS Nurses Office need to have round door knobs replaced with accessible door handles.</p>	<p>MS Office and MS Nurses Office: Round door knobs need to be replaced with accessible door handles.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Tollefson, cco</p>	<p>Ordered - install as soon as received</p>
<p>Cafeteria - MS cafeteria tray return is 35 inches high, and needs to be no more than 34 inches high.</p>	<p>MS cafeteria tray return must be no more than 34 inches high.</p>	<p>Upload photo documentation to CASA (see instructions)</p>	<p>Jeff Tollefson, cco</p>	<p>August 30, 2023</p>

Stacy R Cole

Signature of Superintendent

09/11/2023

Date

Wapello Community School District



IOWA

Department of Education

Chad L. Aldis, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 6, 2023

Mike Peterson, Superintendent
Wapello Community School District
406 Mechanic Street
Wapello, IA 52653

Dear Superintendent Peterson:

As part of Iowa's commitment to improve educational equity in student learning, the Iowa Department of Education (Department) will provide Wapello Community School District (CSD) with a focused equity review (desk audit and Americans with Disabilities Act facility visit). This letter provides important information needed to prepare for the focused equity review.

Purpose:

The Department provides focused equity reviews pursuant to the *Office for Civil Rights (OCR) Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Sex, Race, Color, National Origin, and Disability in Career and Technical Education Programs*. The purpose of the focused equity review is to engage in continuous improvement by exploring civil rights and educational equity-related policies and practices, and to ensure that school districts meet federal and state program requirements related to equity in career and technical education (CTE). Compliance with the following federal civil rights laws will also be included:

- Title VI of the 1964 Civil Rights Act (race, color and national origin equity)
- Title IX of the Educational Amendments of 1972 (sex equity)
- Section 504 of the Rehabilitation Act of 1973 (disability equity)
- Americans with Disabilities Act (ADA) of 1990 (disability equity)

General Information:

The focused equity review will include a document review and an ADA review of facilities.

- **Desk Audit:** See the attached desk audit items. Desk audit documents should be placed in this [form](#). Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. Desk audit items are due by Friday, May 12. If you have any questions, please contact Sara Nickel, School Improvement Consultant.
- **Review of Facilities/ADA visit:** Additional details on the ADA visit will be sent to you by Bill Roederer, Consultant, Bureau of School Business Operations at 515-393-8349 or bill.roederer@iowa.gov, or by Scott Dryer, Consultant, Bureau of School Business Operations at 515-402-8700 or scott.dryer@iowa.gov.

Creating excellence in education through leadership and service

School District Responsibilities:

- By Friday, May 12 the school district will post all desk audit items to this [form](#).
- Within 45 calendar days of the ADA visit, the school district will receive a formal written Equity Final Report, or *Letter of Finding* (LOF), which will contain findings and areas of strength, suggested areas of improvement, and any areas of noncompliance, if applicable.
- If there are noncompliance areas, the school district must respond by completing the *Voluntary Compliance Plan* (VCP). A date will be set up, approximately ninety (90) days after the school district receives the LOF, to review the VCP with you, have both parties sign it, and the Department will keep a copy for federal reporting purposes.
- The Department will submit the LOFs and VCPs to OCR at the U.S. Department of Education with the Department's Biennial Report. Monitoring is conducted by Department staff until all areas of noncompliance are corrected.

Selection Criteria Used to Identify School Districts for a Focused Equity Review:

OCR requires state education agencies to develop methods of administration for assuring school districts' compliance with Title VI, Title IX, Section 504 and Title II of the ADA. These methods of administration include:

- State policy reviews,
- Review of the sub-recipient school district's enrollment and staffing data, as well as other equity data,
- Technical assistance on equity issues and
- Biennial program reports to OCR.

The *Office for Civil Rights Guidelines for Eliminating Discrimination and Denial of Educational Services on the Basis of Gender, Race, Color, National Origin, and Disability in Career and Technical Education Programs* apply to secondary schools providing CTE programs. All school districts with a secondary CTE program will be considered for selection for a focused equity review each year, if six or more years have passed since their last focused equity review. After applying the selection criteria to those school districts, the 10 highest-scoring school districts are chosen for a focused equity review. Newly reorganized school districts are considered as never having received a focused equity review.

There are several criteria used to determine which districts will receive focused equity review each year:

- Proficiency percentages in reading/language arts from Perkins V core indicators of performance, and
- Proficiency percentages in mathematics from Perkins V core indicators of performance.

Selection Criteria Results:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Wapello CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Wapello CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 0 percent for CTE Concentrators.
- Indicator B: Wapello CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 15 percent for CTE Concentrators.
- Indicator C: Wapello CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 15 percent for CTE Concentrators.
- Indicator D: Wapello CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 7.5 percent for CTE Concentrators.

If you have any questions, please contact Sara Nickel at 515-971-7558 or sara.nickel@iowa.gov.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Kimberly Buryanek, Administrator, Division of Learning and Results
Bill Roederer, Consultant, Bureau of School Business Operations
Scott Dryer, Consultant, Bureau of School Business Operations
Sara Nickel, Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement

2022-2023 Equity Desk Audit

Purpose:

Public School Districts, working toward continuous improvement of instruction and student learning, assure ongoing compliance with state and federal legal requirements.

Deadline: Friday, May 12, 2023

Submission:

Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

From: Loder, Amanda <amanda.loder@iowa.gov>

Date: Fri, Apr 7, 2023 at 2:00 PM

Subject: Equity Review Letter and Desk Audit

To: mike.peterson@wapellocsd.org <mike.peterson@wapellocsd.org>

Cc: Kimberly Buryanek <kim.buryanek@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>, Bill Roederer <bill.roederer@iowa.gov>, Scott Dryer <scott.dryer@iowa.gov>, Sara Nickel <sara.nickel@iowa.gov>, Eric Heitz <eric.heitz@iowa.gov>

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement

Dear Superintendent Peterson:

Attached is your school district's official equity review letter and desk audit. If you have any questions, please contact me at tina.wahlert@iowa.gov.

Best,

Tina

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162

tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday

7:30 am - 4:00 pm

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 25, 2023

Mike Peterson
Superintendent
Wapello Community School District
406 Mechanic Street
Wapello, Iowa 52653Re: Iowa Department of Education Equity Review – Letter of Findings

Dear Superintendent Peterson:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the equity review. As a recipient of federal financial assistance, Wapello Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because the Wapello Junior/Senior High School is the only school in the school district that offers CTE programs, it is the only school in Wapello CSD that was part of the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Wapello CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Wapello CSD for an equity review are as follows:

Wapello CSD Data:**Creating excellence in education through leadership and service**

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Wapello CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Wapello CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 0 percent for CTE Concentrators.
- Indicator B: Wapello CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 15 percent for CTE Concentrators.
- Indicator C: Wapello CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 15 percent for CTE Concentrators.
- Indicator D: Wapello CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 7.5 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs and Job Placements; and
- VIII. Employment.

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Wapello CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar

year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Brandon Marquardt, Wapello CSD Board President
Dr. Kimberly Buryanek, Iowa Department of Education Division Administrator, Learning and Results
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Wapello Community School District

Letter of Findings



September 25, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Wapello CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Wapello CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Wapello CSD has appropriately designated the equity coordinator, as listed on documents and the district website. However, the uploaded evidence contained the district equity data. The district did not upload evidence of a committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).

Recommendations:

- Wapello CSD should formalize the process for designating the equity coordinator role by documenting school board action about the appointment and provide an outline of the responsibilities and activities conducted by the equity coordinator. Guidance for the

equity coordinator's role, responsibilities and functions can be found on the Department's website:

<https://educateiowa.gov/sites/default/files/documents/Equity%20Coordinator%20Responsibilities%20Checklist%2010%2012%2020.pdf>

Required Corrective Action(s):

- Wapello CSD will provide evidence of the appointment of the designated equity coordinator, board agenda and minutes of the appointment, and a review of the activities conducted by the equity coordinator (reviewing data, training, reports and/or grievance process).

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Wapello CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Wapello CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Wapello CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

The Wapello Community School District's junior/senior high school building was reviewed for accessibility.

Accessibility was reviewed in the following areas: parking, passenger loading zones, exterior route of travel, entrances, ramps, stairs, lifts, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Wapello Junior / Senior High School Building, 501 Buchanan Ave, Wapello, IA 52653

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1923	Programs within facility must be readily accessible.

Some non-compliance with ADA accessibility was identified at the junior/senior high school building during the visit. If any of the areas in the pre-1977 portions of the high school building are inaccessible, the district must submit a written plan describing how the programs and services in the pre-1977 portions of the high school building are made available to students, staff, parents, and community members with disabilities.

The junior/senior high school building appears to have the required number of accessible parking spaces. However, at the south entrance of the building, one accessible parking space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility. There are currently no signs designating van accessibility.

All entrances to the building are not accessible. The district needs to identify the accessible entrances on the north and south sides of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest accessible entrance. These locations include the two entrances on the west side as well as the entrance on the northwest side.

Because some of the toilet rooms are accessible and some of them are not, accessible toilet rooms must be identified by the international symbol of accessibility and the inaccessible toilet rooms must have directional signage to the accessible toilet room. The toilet rooms in the front part of the building are inaccessible and will need directional signs to the accessible toilet room. In addition, the toilet rooms in the cafeteria are identified by the international symbol of

accessibility. However, the restrooms are not accessible and will need directional signs to the accessible toilet room.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	<p>Parking spaces that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance.</p> <p>Car parking spaces shall be 96 inches wide minimum. One of the accessible 96 inch parking spaces shall be van accessible with a 96 inch wide access aisle and 98 inches of vertical clearance or 132" with an access aisle of 60". All other spaces must be 96" wide with a 60" access aisle.</p>	<p>ADA Standard 208.3.1</p> <p>ADA Standard 208.2, 502.2 & 502.3</p> <p>ADA Standard 216</p>	<p>ADA Standard 208.3.1</p> <p>ADA Standard 208.2, 502.2 & 502.3</p> <p>ADA Standard 216</p>

	The accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. One space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.		
Entrances	<p>Accessible entrances must be identified by the international symbol of accessibility.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance.</p>	ADA Standard 4.1.2(7)(c);4.30	ADA Standard 4.1.2(7)(c);4.30
Toilet Rooms	<p>Accessible toilet rooms must be identified by the international symbol of accessibility.</p> <p>Inaccessible restrooms must have directional signage to the accessible restroom.</p> <p>All hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair.</p>	<p>ADA Standard 4.1.2(7)(d)</p> <p>ADA Standard 4.1.6(3)(e)(iii); 4.30</p> <p>ADA Standard 4.19.4</p>	<p>ADA Standard 4.1.2(7)(d)</p> <p>ADA Standard 4.1.6(3)(e)(iii); 4.30</p> <p>ADA Standard 4.19.4</p>

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Wapello Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates school board policy 102 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. **Employment**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented strategies and school board policy 401 to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. **Salary**

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Wapello CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.



September 25, 2023

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Wapello Community School District



Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Designation of Equity Coordinator – Wapello CSD did not upload evidence of a committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process). <i>Guidelines</i> section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a).	Wapello CSD will provide evidence of the appointment of the designated equity coordinator, board agenda and minutes of the appointment, and a review of the activities conducted by the equity coordinator (reviewing data, training, reports and/or grievance process).	Evidence of this will be shown through documentation including board agenda and minutes of the appointment, and a review of the activities conducted by the equity coordinator.		10/31/23
III. Accessibility for Students with Disabilities				
Written Plan – For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily	The Wapello CSD must develop a written plan that describes how the programs and services in the pre-1977 portions of	Provide a written copy or link to online publication.		


<p>accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>			
<p>Parking – The junior high/high school building appears to have the required number of accessible parking spaces. However, at the south entrance of the building, one accessible parking space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility. There are currently no signs designating van accessibility.</p>	<p>At the south entrance of the building, one accessible parking space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		
<p>Entrances – All entrances to the building are not accessible. The district needs to identify the accessible entrances on the north and south sides of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route</p>	<p>The district needs to identify the accessible entrances on the north and south sides of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

<p>to the nearest accessible entrance. These locations include the two entrances on the west side as well as the entrance on the northwest side.</p>	<p>accessible entrance. These locations include the two entrances on the west side as well as the entrance on the northwest side.</p>			
<p>Toilet Rooms – Because some of the toilet rooms are accessible and some of them are not, accessible toilet rooms must be identified by the international symbol of accessibility and the inaccessible toilet rooms must have directional signage to the accessible toilet room. The toilet rooms in the front part of the building are inaccessible and will need directional signs to the accessible toilet room. In addition, the toilet rooms in the cafeteria are identified by the international symbol of accessibility. However, the restrooms are not handicap accessible and will need directional signs to the accessible toilet room.</p>	<p>Accessible toilet rooms must be identified by the international symbol of accessibility and the inaccessible toilet rooms must have directional signage to the accessible toilet room. The toilet rooms in the front part of the building are inaccessible and will need directional signs to the accessible toilet room. In addition, the toilet rooms in the cafeteria are identified by the international symbol of accessibility. However, the restrooms are not handicap accessible and will need directional signs to the accessible toilet room.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		

Signature of Superintendent

Date

<p>accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>		<p>Mark McDonough, Head Custodian</p>	
<p>Parking – The junior high/high school building appears to have the required number of accessible parking spaces. However, at the south entrance of the building, one accessible parking space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility. There are currently no signs designating van accessibility.</p>	<p>At the south entrance of the building, one accessible parking space must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		<p>12/1/23</p>
<p>Entrances – All entrances to the building are not accessible. The district needs to identify the accessible entrances on the north and south sides of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route</p>	<p>The district needs to identify the accessible entrances on the north and south sides of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest</p>	<p>Upload photo documentation to CASA (see instructions)</p>		<p>12/1/23</p>

<p>to the nearest accessible entrance. These locations include the two entrances on the west side as well as the entrance on the northwest side.</p>	<p>accessible entrance. These locations include the two entrances on the west side as well as the entrance on the northwest side.</p>			
<p>Toilet Rooms – Because some of the toilet rooms are accessible and some of them are not, accessible toilet rooms must be identified by the international symbol of accessibility and the inaccessible toilet rooms must have directional signage to the accessible toilet room. The toilet rooms in the front part of the building are inaccessible and will need directional signs to the accessible toilet room. In addition, the toilet rooms in the cafeteria are identified by the international symbol of accessibility. However, the restrooms are not handicap accessible and will need directional signs to the accessible toilet room.</p>	<p>Accessible toilet rooms must be identified by the international symbol of accessibility and the inaccessible toilet rooms must have directional signage to the accessible toilet room. The toilet rooms in the front part of the building are inaccessible and will need directional signs to the accessible toilet room. In addition, the toilet rooms in the cafeteria are identified by the international symbol of accessibility. However, the restrooms are not handicap accessible and will need directional signs to the accessible toilet room.</p>	<p>Upload photo documentation to CASA (see instructions)</p>		<p>12/1/23</p>

Michael Z. Peters
 Signature of Superintendent

11-9-23
 Date

2022-2023 Community Colleges

Southwest Community College



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

March 14, 2023

Dr. Marjorie McGuire-Welch, President
Southwestern Community College
1501 W. Townline Street
Creston, IA 50801

RE: Iowa Department of Education Equity Review – October 5-6, 2022
Re: Letter of Findings and Voluntary Compliance Plan

Dear President Welch,

The Iowa Department of Education would like to express appreciation for the courtesies extended to the visiting team of Kelly Friesleben, Amy Gieseke, Cale Hutchings, Heather Meissen and Jen Rathje during the educational equity review conducted at Southwestern Community College (SWCC) on October 6-7, 2021, including a facilities review conducted by Scott Dryer and Bill Roederer. We enjoyed our visit and learned a great deal about your college, staff, programs and processes that we have shared in the attached Letter of Findings (LOF).

As a recipient of federal financial assistance from the U.S. Department of Education, SWCC is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer such programs.

In the fulfillment of this requirement, the Iowa Department of Education conducts equity reviews to determine college's compliance with the *Guidelines* and, in particular, the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations, 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations, 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations, 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations, 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

SWCC was selected for review based on the Iowa Department of Education's targeting plan, in which we assess the three community colleges scheduled to undergo accreditation visits in any given year. The targeting plan includes such items such as: enrollment patterns in CTE programs based on disability, sex/gender and racial/ethnic background; percent change in overall minority enrollment; equity-related complaints; and time elapsed since the last on-site equity review.

Letter of Findings:

The attached "Letter of Findings" (LOF) summarizes the Iowa Department of Education's observation and findings in the following nine areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions, and Counseling
- III. Accessibility for Students with Disabilities
- IV. Comparable Facilities
- V. Housing in Postsecondary Institutions
- VI. Services for Students with Disabilities
- VII. Financial Assistance
- VIII. Work-Study, Cooperative Programs, and Job Placements
- IX. Employment

The primary purpose of the LOF is to set forth the findings of the visit. Therefore, it includes the visiting team's observations, recommendations and any areas of noncompliance for which corrective actions are required. Please note that recommendations do not require corrective actions (*i.e., not to be included in the Voluntary Compliance Plan*), but if left unresolved, may lead to future non-compliance issues; so please consider acting on the recommendations made by the visiting team as well as the corrective actions. In addition, the review for compliance with state nondiscrimination law (additional protected categories) was included but is not recorded as a part of the federal requirements that form the basis for conducting the onsite review.

All required corrective actions must be included in SWCC's Voluntary Compliance Plan (VCP), for which a template is attached with the areas of noncompliance already entered. You may choose to use a different format, but at a minimum, your VCP should address each item of noncompliance with the following:

- a description of the corrective action(s) that SWCC will take to remedy each item;
- identification of a target completion date (month and year) for each corrective action;
- identification of the individual(s) responsible for completing each corrective action; and
- a statement of how completion of the corrective action will be verified and reported to the Iowa Department of Education.

The Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt but reasonable in light of each action's difficulty. Typically, remedies are to be completed within a year of the VCP's approval by the Department; however, in the event that a remedy will take longer than a year to complete, the VCP should include a plan for interim measures to address the violations while the long-term remedy is pending.

Dr. Marge Welch
Page 3

Please note that the VCP must be **signed and dated by the college president**. Please return your completed, signed VCP to Kelly Friesleben at the Iowa Department of Education within 45 calendar days of the date of this letter (i.e., **on or before Friday, April 28 , 2023**). This date provides time to negotiate any necessary changes within the 90-day timeframe (from the date of this letter) for the Department to approve your VCP.

Thank you and your team again for your cooperation during the equity review and onsite visit. Your team's time and effort in organizing documents and scheduling interviews was greatly appreciated. If you desire clarification of the contents of the LOF or assistance preparing your VCP, please contact Kelly Friesleben, Education Program Consultant – Student Success, Bureau of Community Colleges at (515/868-2847) or kelly.friesleben@iowa.gov. Also, please be aware that Department consultants are available with continued technical assistance for any issue or concern that may arise as your college fulfills its obligation to reach and maintain compliance with all civil rights requirements. Thank you for your cooperation in this matter and your continued interest in ensuring that Iowa's educational programs effectively serve all of our students.

Sincerely,



Jeremy Varner, Administrator
Division of Community Colleges and Workforce Preparation

JV: KLF

cc: Lindsay Stoaks, Vice President of Instruction, SWCC
Amy Gieseke, Chief, Bureau of Community Colleges
Kelly Friesleben, Education Consultant, Student Success
Eric Heitz, Administrative Consultant, School Improvement

Educational Equity Review

Letter of Findings

**Equity Review Visit
October 5-6, 2022**

**Iowa Department of Education
Grimes State Office Building
Des Moines, Iowa 50319-0146**



**COMMUNITY COLLEGES &
WORKFORCE PREPARATION**
PROSPERITY THROUGH EDUCATION

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SOUTHWESTERN COMMUNITY COLLEGE EQUITY REVIEW

I. ADMINISTRATIVE REQUIREMENTS

This section includes issues related to the board policies, the functioning of the equity coordinator, the grievance procedure, and the dissemination of information regarding those three items to parents, staff, students, and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §100.6(d).

Summary of Findings and Analysis:

The visiting equity team from the Iowa Department of Education (Department) interviewed administrators and staff and reviewed documentation provided by Southwestern Community College (SWCC) to determine whether the college was appropriately providing its annual notice of nondiscrimination.

The annual and continuous nondiscrimination statements are also reviewed during the Department's state accreditation visit, for which guidance was provided to all Iowa community colleges in the fall of 2014, with a recent update provided in January 2022 and is available on the Iowa Department of Education website. That guidance clearly states that each Iowa community college must provide an annual notice of nondiscrimination that includes a brief summary of the college's Career and Technical Education (CTE) offerings and includes program admissions criteria. Furthermore, if the college's service area contains a community of national origin minority, the annual notice must be disseminated to that community in its native language to assure that a lack of English language skills will not be a barrier to admissions. This annual notification must be provided at the start of each academic year and, as indicated above, contain CTE program and admission information not required of the continuous nondiscrimination statement discussed in the next section.

The Department team reviewed SWCC's external and internal communications, website, board policy and publications and recruiting materials distributed prior to each fall semester to determine that they meet the timeline requirements for the *Annual Notice of Nondiscrimination*. The board reaffirmed their board equity policy statement January 2022.

The annual statement reviewed (2022-2023) included a list of CTE programs with any programs with additional admission requirements marked with an asterisk and a link to the program page on the website, and also lists the equity/Title IX coordinator as is required. The annual notice is updated annually by Human Resources and is posted on the human resources website under the title *Equity Policy Statement* (<https://www.swcciowa.edu/about/human-resources/affirmative-action/equity-policy-statement>) by the marketing department, and is also published in the SWCC Weekly newsletter at the beginning of each semester for students. The annual notice is published in both English and Spanish on their website, and can be translated into other languages as needed through Google Translate.

The full Equity Policy (Annual Notice) is a bit buried on the website on the human resources page, so it is **recommended** that the equity policy either has a link on the website footer so it is available on all pages, or that the information is included or linked from the page with the Nondiscrimination Statement that is already linked in the footer.

Required Corrective Action(s): None

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; 28 C.F.R. 35.106.

Summary of Findings and Analysis:

The Department equity team interviewed administrators and staff and reviewed documentation provided by SWCC to determine whether the college was appropriately providing a continuous notice of nondiscrimination statement.

The team reviewed numerous documents provided during both the desk review and the onsite visit. SWCC's continuous notice of nondiscrimination includes all of the federally and state protected classes, the process for formal complaints and contact information for the equity coordinators and OCR office. The statement was consistent and appeared in all major college publications, handbooks, employment materials, on website pages that were reviewed and in the majority of recruitment and admissions materials. The information for the continuous notice is communicated to marketing from human resources, and marketing stores and disseminates the information to make sure it is included on all publications and is consistent wherever it is published.

There is no evidence of a violation.

Required Corrective Action(s): None

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis:

The Director of Human Resources is designated as SWCC's equity officer and is the Title IX Coordinator for employees. This person also coordinates the institution's Title IX activities. The equity-related responsibilities of this individual are outlined in the Human Resources Director job description. In addition, the Dean of Student Services is listed as the Title IX Coordinator for students, and the responsibilities of this individual are outlined in the Dean of Student Services job description. Board policies do indicate that both roles have responsibilities for equity related complaints and grievances.

SWCC leadership informed the visiting team that the college has designated one official equity coordinator, and two Title IX Coordinators. This information is shared with employees at the through the employee handbook, and shared with students in the student handbook and through the SWCC Weekly newsletter. Published nondiscrimination statements include the contact information for the equity coordinator. The Department visiting team found that the staff and students interviewed could identify their respective equity contact by name. The students also mentioned they could get help from their faculty and staff contacts, and felt comfortable that they could get help. The team confirmed that staff members were confident that they had been trained to help students through an equity issue, and they would always involve the equity coordinator for student issues.

The Title IX Coordinators have received training in equity-related areas through ATIXA, Ahlers & Cooney, and the National Association of Clery Compliance Officers and Professionals (NACCOP). In addition, both Title IX and Safe Colleges trainings are required on a regular basis for all faculty, staff and students.

In addition, SWCC has a diversity committee that helps to plan professional development events and fosters diversity among faculty, staff and students.

There was no evidence of a violation.

Required Corrective Action(s): None

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b).

Summary of Findings and Analysis:

The Department equity team reviewed SWCC's Title IX and Section 504/Title II grievance procedures as well as all grievances reported over the past five years. The student and staff grievance process follow the same steps. Grievance procedures appear on the website, within the employee handbook and in the student handbook. Students can submit an informal or formal grievance either in-person through designated staff, such as the Equity/Title IX Coordinator or other administrators depending on the nature of the grievance, or through a form online with Maxient reporting software. Staff can either complete a form found outside the HR Director's office, or by sending an email. In the visiting team's student and staff interviews, all participants felt comfortable with at least one individual on campus whom they would contact for a grievance.

The visiting team found that there was one employee grievance submitted over the past five years and a few student grievances. All student grievances are documented with the appropriate administrator and each followed the prescribed steps and timelines. Interviews with staff and students confirmed that they knew where to find the grievance procedures and how to begin the process. The grievance process also notifies the complainant of the following: the right to end the informal process at any time, the student code of conduct appeal process and the right to pursue a formal complaint with the Iowa Civil Rights Commission or federal authorities.

Title IX processes and publications at the college make clear the ability for a complainant to take a complaint to the designated Title IX/Equity Coordinators (Dean of Student Services or Director of Human Resources) to discuss both formal and informal reporting options. The investigation and resolution processes are documented in the catalog along with the employee and student handbooks and include information for both the complainant and respondent on the following: confidentiality, timeframe, supportive or protective measures, investigative process, right to an advisor, appeals, and resolution options.

There is no evidence of a violation.

Required Corrective Action(s): None

II. RECRUITMENT, ADMISSIONS AND COUNSELING

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), 104.42(a), (b) and (c), 104.43, 106.21, 106.22, 106.34 and 106.35; 28 C.F.R § 35.130.

Summary of Findings and Analysis:

The Department equity team reviewed SWCC's website and catalog for detailed admissions criteria listed for each career and technical (CTE) program utilizing criteria beyond the college admissions process, when appropriate. The catalog contains a section that has a description of each CTE program, the number of credits available/required and any programs or courses that have prerequisites. It also contains general information including degree completion requirements and an explanation of the grading system. The annual statement - titled *equity policy statement* under the About/Human Resources section of the website - includes a list of CTE programs and identifies those programs with differing admission requirements with a hyperlink to the specific admission requirements for that program.

Upon completion of a desk review of materials and through interviews, these steps seem to apply to all students, regardless of sex, race, color, national origin or disability. Interviews with CTE students and staff did not raise concerns about any inappropriate application of admissions criteria for CTE programs based on sex, race, color, national origin or disability.

There is no evidence of a violation.

Required Corrective Action(s): None

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L.

Summary of Findings and Analysis:

After a thorough desk review and on-site interviews with students and staff, the Department found no evidence that SWCC's CTE programs are inaccessible to English Language Learners (ELL). In fact, the college has procedures in place to identify and assess applicants with limited English proficiency and provided examples of course remediation offerings focused on getting the non-native English speakers ready for college-level coursework. The team learned that SWCC determines English proficiency for all non-native English speakers by accepting results from TOEFL, IELTS or Duolingo, or completion of a college-level English Composition Course. English as a Second Language (ESL) classes are available for ELL Students. ESL classes reinforce life skills in English in the areas of reading, writing, speaking and listening. All of these opportunities are designed to improve the student's language skills for success in college-level courses and programs of study.

SWCC has incorporated Google Translate into their college website so the information provided to students can be translated into their native language. This also allows admissions, registration, CTE program descriptions and course descriptions to be translated easily. SWCC also has two bilingual staff who speak Spanish and English who are able to serve as interpreters if needed. SWCC also utilizes the Microsoft Immersive Reader embedded into their Canvas Learning Management System, and recently implemented the updated Zoom One that provides real-time translation and multilingual captions. Multiple faculty implemented the new tool into their classrooms for the fall 2022 semester.

There was no evidence of a violation.

Required Corrective Action(s): None

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A, V.B, and V.D; 34 C.F.R. §§100.3(a) and (b); 104.47(b), and 106.36; 28 C.F.R. § 35.130.

Summary of Findings and Analysis:

The Department team reviewed several sources of evidence provided by the college and conducted interviews with students and staff from student services, admissions and financial aid. Through this review it is evident that SWCC is dedicated to ensure counseling procedures are free from stereotyping and strive to avoid discriminatory practices. SWCC has all requisite policies in place for non-discrimination – including one for pregnant and parenting students. SWCC uses its CTE program evaluation process and enrollment management plan to analyze CTE program enrollment data and identify disproportionate enrollment in CTE programs. The college's geographic area has a relatively homogeneous population; therefore, they have implemented strategies to increase the cultural diversity of the student population.

There was no evidence that the college, in practice or policy, discriminates against students based on race, color, national origin, sex or disability in the placement or counseling of students. SWCC provides annual diversity training to all faculty and staff through (Vector) Safe Colleges training, and encourages additional professional development at various workshops and conferences available in the state. Additionally, advisors are trained to help students of all backgrounds and there is no evidence that students are being excluded from any courses or programs nor evidence that students are placed into selected or particular programs. Advisors also receive annual training on the SWCCyou portal and any program updates to better serve students. Resources such as Google Translate and Kurzweil 3000 are available to staff and students.

There is no evidence of a violation.

Required Corrective Action(s): None

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.47(b).

Summary of Findings and Analysis:

Through evidence provided by the college and interviews with staff from admissions, student services and financial aid, the Department team determined that the college provides comparable advising and counseling services to students with limited English-speaking ability and hearing impairments. The college is small enough that students are required to all meet with an advisor and there are bilingual staff that help limited English-speaking students with program and career planning, which includes helping them to understand recruiting, admissions and advising materials. They also utilize Google Translate to translate and make information and documents accessible.

SWCC offers multiple resources to assist students with limited English language skills or hearing impairments. Google Translate is available on their website and can translate any of the information into many different languages. Their Canvas Learning Management System has Microsoft Immersive Reader embedded, which has the capability to highlight and read text simultaneously and offers more than 60 languages for easy translation of the materials. Smarthinking is also embedded in Canvas and offers real-time online tutoring to students. SWCC purchased Zoom One in June 2022, which provides live translation and captions from 10 supported languages. Some faculty implemented Zoom One in their fall 2022 courses, with a plan for additional courses to use the software in the future, and admissions representatives can also use this for online meetings with prospective students. Additionally, SWCC provides Kurzweil 3000 assistive technology software free to students, who are able to access it online or download it to a personal computer.

There is no evidence of a violation.

Required Corrective Action(s): None.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Section V.A, V.C and V. E; 34 C.F.R. §§ 104.42(a) and 106.23(a) & (b).

Summary of Findings and Analysis:

The Department equity team reviewed program enrollment material, including the college catalog, college policies, course descriptions, CTE program brochures, the college website and course schedules. Although there is disproportionate enrollment by some demographics in some CTE programs, there is no evidence that SWCC's promotional materials or activities create or perpetuate stereotypes or restrictions based on race, color, national origin, sex or disability.

One of the reasons SWCC was selected to receive a focused equity visit was because of some disproportionate enrollment in CTE courses by sex, race and disability. To address CTE programs that have disproportionate enrollments, the college has a comprehensive enrollment management plan that is reviewed on an annual basis, and has also taken the following steps:

- Reaching out to diverse populations in the district (veterans, Hispanic and Latinx populations, females in nontraditional career areas) through events such as their CTE Day, 8th grade careers conference, TRIO talent search, and participating in the Osceola Latino Festival.
- The college has bilingual (English and Spanish) staff to meet with prospective students and their families in order to provide translation and assistance with understanding admission information. Resources such as Google Translate, Microsoft Immersive Reader, and Zoom One can be used to provide translation to additional languages as needed.
- Marketing materials are used to promote various events and activities to recruit diverse student populations, and are reviewed to show representation of the diverse population at SWCC.

There was no evidence of a violation.

Required Corrective Action(s): None

III. ACCESSIBILITY FOR STUDENTS WITH DISABILITIES

This section includes a review of the accessibility of facilities and instructional program for students, staff, parents and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

On October 5 - 6, 2022, DE consultants reviewed the Southwestern Community College campuses in Creston, Osceola and Red Oak, Iowa. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

The tables on the following pages document the buildings reviewed and compliance issues discovered. The appropriate American with Disability Act (ADA) standards are provided in each “Building Information” table for the college’s reference. These standards are based on each building’s year of construction or the most recent renovation – dates provided by the college.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

The DE facility reviewers were accompanied by Wayne Pantini, Assistant Vice President of Economic Development. The following buildings were included in the review.

Southwestern Community College, 1501 West Townline St., Creston, IA 50801

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Instructional Center	1971	1991 ADA Standards
Allied Health & Science Center	2006	2010 ADA Standards
Student Center	1975	1991 ADA Standards
Tech I Center	1976	1991 ADA Standards
Tech II Center	2003	2010 ADA Standards
Ag Instructional	2009	2010 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Tech I Center - Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible

Southwestern Community College, Osceola Center, 2520 College Dr., Osceola, IA 50213.

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Instructional Center	1994	1991 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
No areas of non-compliance			

Southwestern Community College, Red Oak Center, 2300 N 4th St., Red Oak, IA 51566.

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Instructional Center	1991	1991 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Entrances	<p>Accessible entrances must be identified by the international symbol of accessibility.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance.</p>	ADA Standard 4.1.2(7)(c);4.30	ADA Standard 4.1.2(7)(c);4.30

Summary

The only item to be addressed on the Creston campus is the non-compliance with ADA accessibility at the Tech I Center Building. If any of the areas in the pre-1977 portions of the building are inaccessible, the school must submit a written plan describing how the programs and services in the pre-1977 portions of the building are made available to students, staff, parents, and community members with disabilities.

The only other item to be addressed is located on the Red Oak campus. All entrances to the Red Oak campus building are not accessible. The district needs to identify the accessible entrance on the south side of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest accessible entrance.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

IV. COMPARABLE FACILITIES

A. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; and 34 C.F.R. §106.33

Summary of Findings and Analysis:

Southwestern Community College has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1

There was no evidence of a violation.

Required Corrective Action(s): None

V. HOUSING IN POSTSECONDARY INSTITUTIONS

This section includes a review of the accessibility of and policies associated with on-campus housing provided for students with disabilities.

Applicable Requirements: *Guidelines* Section VI.C; 34 C.F.R. § 100.3(b), 104.45, and 106.32

Summary of Findings and Analysis:

SWCC has four residence halls serving about 220 students at its Creston campus which provide housing opportunities to their resident students. The housing application process is the same for all students and is available online, along with the residence hall handbook, which includes information on Title IX and other key contacts, ADA accessibility procedures, grievance procedures, service and assistance animal policies and safety information for students. The housing rules and regulations document itself is very clear and informative. Housing students receive regular training on safety and grievance or sexual misconduct (Title IX) processes. The residence halls have rooms available for accessibility needs, and students that aren't able to go home over breaks are able to submit a prior approval request to stay during breaks. Summer housing is also available to students under a separate contract.

Based on the information provided, there was no evidence of a violation.

Required Corrective Action(s): None

VI. SERVICES FOR STUDENTS WITH DISABILITIES

This section includes a review of the support services, accommodations and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§104.4(a), 104.43 and 104.44; 28 C.F.R. §§ 35.130, and 35.160-35.163.

Summary of Findings and Analysis:

Students with disabilities are to be served in the least restrictive way possible. Program modifications are to be made to allow the involvement of English language learners as well. Postsecondary Institutions may require students to follow reasonable procedures to request an academic adjustment and students are responsible for knowing and following those procedures. If the documentation submitted does not meet the college's requirements, a school official should tell students in a timely manner what additional documentation they need to provide.

The Department team found evidence of a consistent process for the implementation of a Section 504 program integral for ensuring identification, development and implementation of individual accommodations for eligible students. The attention paid to students with special needs is noteworthy and students indicated they knew of or had an individual they could turn to if they needed an accommodation. In addition to interviews, the Department team reviewed the following documents provided by SWCC: a random sample of student accommodations over the past five years, the student handbook, the faculty handbook, related board policies, course syllabi, the student orientation materials, the accommodations procedures, training materials and application and the college's website. Faculty, adjunct faculty and staff are trained as a part of orientation. Microsoft Immersive Reader is integrated within Canvas to provide accessibility to all course materials for students and Zoom One is utilized in some classes. Based on the materials reviewed and interviews with students and key staff, SWCC appears to have services in place that work with students in an interactive process to identify an appropriate academic adjustment.

There was no evidence of a violation.

Required Corrective Action(s): None.

VII. FINANCIAL ASSISTANCE

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), 104.46, and 106.37.

Summary of Findings and Analysis:

Colleges are not to limit honors, awards and scholarships to a group on the basis of sex, race, color, national origin or disability unless such targeting is done to provide opportunities to members of a group that has traditionally been underrepresented. A college may administer or assist in the administration of financial assistance through scholarships, fellowships or other forms that may require that awards go to a student of a particular sex, race, color, national origin or with a particular disability; however, the overall effect of such restricted awards must not result in discrimination in access to total scholarships on the basis of sex, race, color, national origin or disability. Outside agencies and donors that provide financial assistance are to be notified of the college's nondiscrimination policy.

SWCC provides and administers financial assistance to its students. The Department visiting team reviewed SWCC'S documentation including financial aid and scholarship applications and scholarship information, materials available to students on its website and in the financial aid office. The team interviewed the Chief Financial Aid Administrator, Chief Financial Officer, and Scholarship staff, to learn about the college's process and procedures for informing students about financial requirements and opportunities. The team also reviewed the process and procedures established in the financial aid office and found that all financial aid processes are inclusive of all students. The college has a strong connection with the community that is reflected in the large number of scholarships granted annually (around 120 available for 2022-2023). SWCC has an online financial aid guide that provides information and resources, which can be translated via Google Translate or read aloud with Kurzweil 3000. Additionally, staff are available to meet with students individually to assist with FAFSA completion, scholarship applications and any other financial aid questions or needs a student may have. There is one application form for all scholarship opportunities available at SWCC.

There was no evidence that the college discriminated against students on the basis of race, color, national origin, sex or disability in its administration of financial assistance.

Required Corrective Action(s): None.

VIII. WORK-STUDY, COOPERATIVE PROGRAMS, AND JOB PLACEMENT

This section includes a review of contracts with all employers or other sponsors offering work study, cooperative education, job placement and apprenticeship programs and the application materials that students complete to obtain these positions.

A. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), 106.31, and 106.38(a).

Summary of Findings and Analysis:

The Department equity team reviewed SWCC's contracts and memoranda of understanding (MOU) with employers or other sponsors offering work study, cooperative education, job placement, clinical and apprenticeship program opportunities and the student work study employment approval form and handbook. The contracts contained an assurance that the employer or sponsor does not discriminate against students on the basis of race, color, national origin, sex or disability.

Based on interviews with students and staff, there was no evidence that students had been limited from internship or employment opportunities on the basis of their race, color, national origin, sex or disability.

Required Corrective Action(s): None.

IX. EMPLOYMENT

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61.

Summary of Findings and Analysis:

The Department team reviewed documentation submitted by the college which included sample job descriptions, job vacancy notices, administrative procedures on hiring, the faculty and employee handbooks, and the classification and pay guide. The team interviewed the director of human resources to learn more details about college hiring processes. The interviews of various employee groups showed that they were knowledgeable about the equity coordinators and grievance processes. Staff and faculty also shared information about the equity and Title IX trainings in which they had participated.

The nondiscrimination statement was included in all reviewed position vacancy notices, the employee handbook and the hiring process guide. The salary classification schedules are differentiated by job classification, all of which are clearly documented. The college utilizes Iowa Works and Indeed to recruit staff and faculty, and athletics utilizes the NCAA market place. Publications and policies from human resources seem free of bias and have required statements.

There is no indication that the college discriminates in hiring or pay based on race, color, national origin, sex or disability.

There is no evidence of a violation.

Required Corrective Action(s): None.

**ATTACHMENT B
AREAS OF NONCOMPLIANCE
EQUITY VOLUNTARY COMPLIANCE PLAN (VCP)
Southwestern Community College**

Required Corrective Action	Specific remedies to correct	Evidence needed to verify remedy	Staff member(s) responsible	Timeline for completion
III. <u>Accessibility for Students with Disabilities</u>			Name, Title	Month, Year
<u>Written Plan</u> - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities. (Creston campus – Tech I Center)				
<u>Entrances</u> - All entrances to the Red Oak campus building are not accessible. The district needs to identify the accessible entrance on the south side of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest accessible entrance.				

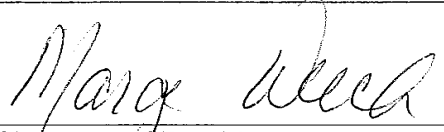
Signature of President

Date

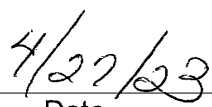
**ATTACHMENT B
AREAS OF NONCOMPLIANCE
EQUITY VOLUNTARY COMPLIANCE PLAN (VCP)
Southwestern Community College**

Required Corrective Action	Specific remedies to correct	Evidence needed to verify remedy	Staff member(s) responsible	Timeline for completion
III. <u>Accessibility for Students with Disabilities</u>			Name, Title	Month, Year
<p>Written Plan - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities. (Creston campus – Tech I Center)</p>	<p>1. Classes are currently re-assigned to other accessible areas within the Technical Center I. 2. The long-term goal is to permanently re-locate the college's industrial technology program to Osceola in collaboration with a prospective regional training center partnership with Clarke County Development Corporation. The re-location of the industrial technology program will free up two classrooms on the ground level of the Creston campus which will provide space for the welding and carpentry classrooms that are currently located on the second floor of the Technical Center I.</p>	<p>1. PowerPoint Presentation</p>	<p>Lindsay Stoaks, Vice President of Instruction Marvin Godden, Director of Plant Services</p>	<p>1. On-going 2. It is anticipated ground will be broken on the prospective Osceola regional training center in September 2023. Therefore, it is feasible for the industrial technology program to be re-located to Osceola effective for the 2024-25 academic year pending approval by the SWCC board of trustees.</p>

<p><u>Entrances</u> - All entrances to the Red Oak campus building are not accessible. The district needs to identify the accessible entrance on the south side of the building by the international symbol of accessibility. For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest accessible entrance.</p>	<p>1. Install directional signage to all inaccessible entrances to indicate the route to the nearest entrance. 2. Install the international symbol of accessibility sticker to the accessible entrance on the south side of the center.</p>	<p>1. Photos and invoices</p>	<p>Marvin Godden, Director of Plant Services</p>	<p>Completed – April 2023 Anticipated Completion Date - May 2023</p>
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 Signature of President



 Date

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

December 20, 2023

Lindsay Stoaks, President
Southwestern Community College
1501 W Townline St
Creston, IA 50801

Dear President Stoaks:

Through recent communication with your team regarding your college's October 2022 equity review, the Iowa Department of Education is pleased to report that staff at Southwestern Community College (SWCC) have satisfactorily completed all actions submitted on your Voluntary Compliance Plan (VCP), including future completion of the ORBIT Center in Osceola which will fulfill the written plan. Therefore, SWCC's equity review is considered "closed". However, it should be noted that the United States Department of Education's Office for Civil Rights (OCR) could re-open the file at any time if they have questions regarding any compliance items stated in your original Letter of Finding or VCP. We will inform you if we receive any such inquiries from OCR.

If we can be of further assistance, please do not hesitate to contact the equity team leader, Kelly Friesleben at kelly.friesleben@iowa.gov or 515-868-2847. Our mutual efforts toward achieving excellence and equity in the educational programs offered at SWCC, as well as your peer institutions, will serve to improve the quality of life for all Iowans.

Sincerely,

Jeremy Varner, Bureau Chief
Bureau of Community Colleges and Postsecondary Readinesscc: Dr. John Franklin, Interim Vice President of Instruction, SWCC
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Amy Gieseke, Section Chief, Bureau of Community Colleges and Postsecondary Readiness
Kelly Friesleben, Consultant, Bureau of Community Colleges and Postsecondary Readiness

2023-24 LEAs

LEA	Selection Letter Sent	Letter of Findings (LOF) Sent	Number of Corrective Actions	Voluntary Compliance Plan (VCP) Received	Date Closed
Council Bluffs CSD	4/10/24	10/8/24	32	11/18/24	Monitoring
Davenport CSD	4/10/24	10/14/24	48	11/14/24	Monitoring
Eddyville-Blakesburg-Fremont CSD	4/10/24	10/9/24	11	12/3/24	Monitoring
Lamoni CSD	4/10/24	9/4/24	14	11/26/24	Monitoring
Montezuma CSD	4/10/24	10/8/24	9	11/19/24	Monitoring
Northwood-Kensett CSD	4/10/24	10/9/24	6	11/19/24	Monitoring
Seymour CSD	4/10/24	10/21/24	29	Not received as of 12/12/24 *	n/a
Tri-County CSD	4/10/24	9/30/24	7	10/16/24	Monitoring
Turkey Valley CSD	4/10/24	10/1/24	11	12/2/24	Monitoring
Woodbury Central CSD	4/10/24	9/4/24	12	11/13/24	Monitoring

* See additional correspondence included below.

Council Bluffs Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Dr. Vickie Murillo, Superintendent
Council Bluffs Community School District
300 W Broadway, Suite 1600
Council Bluffs, IA 51503

Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Murillo:

As a recipient of federal financial assistance, Council Bluffs Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Council Bluffs CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Council Bluffs CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 42.63% for CTE Concentrators.
- **Indicator B:** Council Bluffs CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 33.48% for CTE Concentrators.
- **Indicator C:** Council Bluffs CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 76.12% for CTE Concentrators.
- **Indicator D:** Council Bluffs CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 38.06% for CTE Concentrators.

District Responsibilities

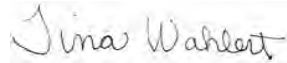
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Pam Spangler, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter Σ Inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>
to vmurillo, Kimberly, SueAnn, Eric, Scott, Michael, Pam ▾

Wed, Apr 10, 3:01PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 8, 2024

Dr. Vickie Murillo, Superintendent
Council Bluffs Community School District
300 W Broadway, Suite 1600
Council Bluffs, IA 51503

Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Murillo:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Council Bluffs Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Abraham Lincoln High School, Thomas Jefferson High School, Kirn Middle School, and Wilson Middle School buildings. The purpose of the review was to determine the district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Council Bluffs CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Council Bluffs CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Council Bluffs CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2023-2024. Below is a summary of Council Bluffs CSD's data for students who were calculated to be CTE Concentrators in the 2022-2023 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Council Bluffs CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 42.63 percent for CTE Concentrators.
- Indicator B: Council Bluffs CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 33.48 percent for CTE Concentrators.
- Indicator C: Council Bluffs CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 76.12 percent for CTE Concentrators.
- Indicator D: Council Bluffs CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 38.06 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Council Bluffs CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong

recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Jared Tripp, Council Bluffs CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Council Bluffs Community School District

Letter of Findings



October 8, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Council Bluffs CSD is published and all required protected classes for both programs and employment are listed. The career and technical education (CTE) programs were not listed in School Board Policy 102.5.

Recommendations:

- It is recommended that the district add the CTE programs to the applicable school board policy.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Council Bluffs CSD is appropriately communicated and contains all required protected classes for both programs and employment, but is missing contact information in two artifacts.

Recommendations:

- The Thomas Jefferson Parent & Student Handbook should include the contact information for the U.S. Department of Education Office of Civil Rights. The updated contact information is:

Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education,
John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL
60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email:
OCR.Chicago@ed.gov

Required Corrective Action(s):

- The High School Program of Studies Catalog is missing the complete contact information for the equity coordinator. The information should include: Name, Title, Address, Phone Number, and E-mail Address.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Council Bluffs CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Council Bluffs CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.1.

Recommendations:

- Board policy 102.1 should include the contact information for the U.S. Department of Education Office of Civil Rights. The updated contact information is:

Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education,
John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL
60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email:
OCR.Chicago@ed.gov

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Council Bluffs CSD School Board policy number 405.1 includes the protected classes. However, the policy has not been reviewed since February 6, 2017, which is beyond the five-year review period required by state law. See [12.3\(2\)](#).

Required Corrective Action(s):

- Council Bluffs CSD will update school board policy 405.1.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Council Bluffs CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On May 7-8, 2024, Department consultants, Scott Dryer and Mike Wright, and Nick Olson and Aaron Rang from Council Bluffs CSD reviewed Council Bluffs CSD in Council Bluffs, Iowa. This review included Abraham Lincoln High School, Thomas Jefferson High School, Kirn Middle School, and Wilson Middle School buildings. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Abraham Lincoln High School, 1205 Bonham Street, Council Bluffs, IA 51503

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1960	Programs within facility must be readily accessible.

Additions and renovations	Renovations in 2008	1991 ADA Standards
---------------------------	---------------------	--------------------

The items to be addressed on Abraham Lincoln High School campus are listed below.

- Parking: appropriate number of accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Entrances: appropriate accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.
- Indoor Accessible Route – AED Protrusion as noted.
- Exterior Route of Travel: installation of or modification of handrails as noted.
- ADA Locker Room: ADA signage with accessible shower stall.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible.	Programs within facility must be readily accessible.
Parking	The main parking lot has 268 stalls with 9 accessible stalls 3 of which are van accessible. The parking lot will need to install the appropriate van accessible signage.	4.6 4.30	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

Bus Loading Zone	The bus loading needs to include ADA Accessible signage.	4.30	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Accessible Route	Handrails	4.26	Handrails provided along walking surfaces complying with 403, required at ramps complying with 405, and required at stairs complying with 504 shall comply with 505.
Signage	Exterior Doors Accessible Route - Entrance	4.1 4.30	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Protrusion exceeding 4 inches	Door 115 – AED	4.4	Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.
Signage	ADA Locker Room	4.30	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.

Thomas Jefferson High School, 1205 Bonham Street, Council Bluffs, IA 51503

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1920	Programs within facility must be readily accessible.
Addition	Renovations in 2008	1991 ADA Standards

The items to be addressed on Thomas Jefferson High School campus are listed below.

- Parking: appropriate number of accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: Signage
- General Accessibility: Written plan for the sound and light area in the Auditorium and Robotics classroom
- Interior Accessible Route: AED Protrusion by Door 115
- Toilet Rooms: appropriate signage as noted
- Signage: appropriate accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible.	Programs within facility must be readily accessible.
Parking	The main parking lot has 288 stalls with 6 accessible with 2 that are ADA stall van accessible. The parking lot will need to add 1 ADA parking stall and the appropriate van accessible signage for the existing van assessable stalls	4.6 4.30	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish

			floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading zone at Door 16 needs to include ADA Accessible signage.	4.6 4.30	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
General Accessibility	Room 2501 - Robotics	4.3	Need a written Plan as Auditorium was built prior to 1977.
General Accessibility	Auditorium Upper Deck Light and Sound Booth	4.3	Need a written Plan as Auditorium was built prior to 1977.
Toilet Room	Unisex Bathroom Grab Bar	4.16.4	Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.
Toilet Room	C200 Boys Restroom	4.16.2	Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.
Signage	Room C111 ADA Restroom and Shower	4.30	Signs shall be provided in accordance with 216 and shall comply with 703. The

			classrooms needs ADA Signage that indicates accessible shower stall.
Signage	Exterior Doors Accessible Route - Entrance	4.30	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Signage	Locker Room Old Field House	4.30	Signage on exterior of the locker rooms needs ADA Signage that indicates non-accessible shower stall.
Signage	TJAC Varsity Boys Locker Room D131	4.30	Signage on exterior of the locker rooms needs ADA Signage that indicates non-accessible shower stall.
Signage	TJAC Room 110 and Room 120	4.30	Signage on exterior of the locker rooms needs ADA Signage that indicates non-accessible shower stall.

Kirn Middle School, 100 North Avenue, Council Bluffs, IA 51503

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1979	Section 504 / 1991 ADA Standards

The items to be addressed on Kirn Middle School campus are listed below.

- Parking: appropriate number of accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Accessible Route: handrails as noted
- Interior Accessible Route – AED Protrusion
- Toilet Rooms: grab bars and appropriate covering of hot water pipes as noted.
- Entrances: appropriate accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

- Locker Room Signage: shower stall accessible

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible.	Programs within facility must be readily accessible.
Parking	North parking lot will need to add 1 ADA space for a total of three, with 1 space being ADA van accessible The parking lot will need to install with the appropriate van accessible signage.	4.6 4.30	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading needs to include ADA Accessible signage.	4.30	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Accessible Route	Handrails	4.26 4.8.7	Extended Floor or Ground Surface. The extended surface prevents wheelchair casters and crutch tips from slipping off the ramp surface.

			<p>A curb or barrier shall be provided that prevents the passage of a 4 inch (100 mm) diameter sphere, where any portion of the sphere is within 4 inches (100 mm) of the finish floor or ground surface.</p> <p>Edge Protection. Ramps and landings with drop-offs shall have curbs, walls, railings, or projecting surfaces that prevent people from slipping off the ramp. Curbs shall be a minimum of 2 inches (50 mm) high.</p>
Toilet Room	Kitchen Grab Bars	4.26	<p>The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall.</p> <p>The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.</p> <p>The space between the wall and the grab bar shall be 1½ inches (38 mm). The space between the grab bar and projecting objects below and at the ends shall be 1½ inches (38 mm) minimum.</p> <p>Grab bars shall be installed in a horizontal position, 33</p>

			<p>inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>
Exposed Pipes and Surfaces	Kitchen	419.4	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>
Accessible Route - Entrance	Signage Exterior Doors including main entrance	4.30	<p>Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.</p>
Interior Accessible Route	Door 115 – AED Protrusion exceeding 4 inches	4.4	<p>Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall</p>

			protrude 4 inches (100 mm) maximum horizontally into the circulation path.
Signage	Locker Room	4.30	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.

Wilson Middle School, 715 North 21st Street, Council Bluffs, IA 51501

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1960	Programs within facility must be readily accessible.
Addition	Renovations in 1990 and 2020	2010 ADA Standards

The items to be addressed on Wilson Middle School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Entrances: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.
- Toilet Rooms: appropriate covering of water pipes as noted.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	<p>Parking lot will need to add 2 ADA spaces for a total of 6, with 2 space being ADA van accessible</p> <p>The parking lot will need to install with the appropriate van accessible signage.</p>	502.6 208.2	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading needs to include ADA Accessible signage.	503	International Symbol of Accessibility. The International Symbol of

			Accessibility shall comply with Figure 703.7.2.1.
Signage	Exterior Doors Accessible Route - Entrance	216.6	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Signage	Girls Locker Room ADA Signage	216.6	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Exposed Pipes and Surfaces	Girls Locker Room Plumbing enclosure	606.5	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Abraham Lincoln High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1.
- Thomas Jefferson High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1.
- Kirn Middle School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1.
- Wilson Middle School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates school board policy 102 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district is working to ensure student work place experiences are free of discrimination. There does not appear to be any bias in the awarding of financial assistance. However, there is missing contact information in several documents.

Required Corrective Action(s):

- The Job Shadow Training agreement must include the contact information of the equity coordinator following the notice of nondiscrimination.
- The Intern Training Agreement must include the contact information of the equity coordinator following the notice on nondiscrimination.
- The Registered Apprenticeship Program Standards Handbook must include the notice of nondiscrimination and contact information.
- The On the Job Learning and Evaluation handouts for welding, early childhood education, culinary and certified nursing assistant must include the notice of nondiscrimination and contact information.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented strategies and school board policy 418 to ensure equity related to employment and personnel practices.

Recommendations:

- The Iowa Civil Rights Commission may be included in the notice of nondiscrimination. If so, please update the address to: 6200 Park Ave Suite 100, Des Moines, IA 50321, Ph: (515)281-4121 (Code 418.1). See <https://icrc.iowa.gov/>.
- The U.S. Department of Education Office of Civil Rights should be included in the notice of nondiscrimination. The updated contact information is:

Director of the Office for Civil Rights, Chicago Office, U.S. Department of Education,
John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL
60604, Telephone: (312) 730-1560, Facsimile: (312) 730-1576, Email:
OCR.Chicago@ed.gov

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Council Bluffs CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Council Bluffs Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
Continuous Notice of Nondiscrimination. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV O and V.C	The High School Program of Studies Catalog must include the complete contact information for the equity coordinator. The information should include: Name, Title, Address, Phone Number, and E-mail Address.	Revised High School Program of Studies catalog with complete contact information of the equity coordinator.		11/15/24
Grievance Procedures Civil Rights Grievance Policy and Procedures. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	School Board policy number 405.1 has not been reviewed since February 6, 2017, which is beyond the 5-year review period. 12.3(2).	An updated version of School Board Policy 405.1.		11/15/24
III. Accessibility for Students with Disabilities				
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily	Provide a written copy or link to online publication.		

	<p>accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p> <p>Specifically, the district must address the following areas: Room 2501 – Robotics (TJ HS); Auditorium Upper Deck Light and Sound Booth (TJ HS)</p>			
<p>Parking (AL HS): Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p>	<p>The main parking lot has 268 stalls with 9 accessible stalls 3 of which are van accessible. The parking lot will need to install the appropriate van accessible signage.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Bus Loading Zone (AL HS): International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.</p>	<p>The bus loading needs to include ADA Accessible signage.</p>	<p>Upload photo documentation to CASA.</p>		

<p>Accessible Route – Handrails (AL HS): Handrails provided along walking surfaces complying with 403, required at ramps complying with 405, and required at stairs complying with 504 shall comply with 505.</p>	<p>The extended surface prevents wheelchair casters and crutch tips from slipping off the ramp surface.</p> <p>A curb or barrier shall be provided that prevents the passage of a 4 inch (100 mm) diameter sphere, where any portion of the sphere is within 4 inches (100 mm) of the finish floor or ground surface.</p> <p>Edge Protection. Ramps and landings with drop-offs shall have curbs, walls, railings, or projecting surfaces that prevent people from slipping off the ramp. Curbs shall be a minimum of 2 in (50 mm) high).</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Entrance Location (AL HS): Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.</p>	<p>Exterior Doors Accessible Route to Entrance signage.</p>	<p>Upload photo documentation to CASA.</p>		

<p>Indoor Accessible Route – AED (AL HS): South Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.</p>	<p>AED by Door 115 must have an object more than 27 inches below the AED.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Locker Room (AL HS): Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.</p>	<p>Signage indicating ADA accessible shower stall.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Parking (TJ HS): Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p>	<p>The main parking lot has 268 stalls with 9 accessible stalls 3 of which are van accessible. The parking lot will need to install the appropriate van accessible signage.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Bus Loading Zone (TJ HS): International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.</p>	<p>The bus loading needs to include ADA Accessible signage.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Toilet Room Grab Bars (TJ HS): Grab bars shall be installed in a horizontal</p>	<p>Install grab bars and signage for unisex bathroom</p>	<p>Upload photo documentation to CASA.</p>		

<p>position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>				
<p>Toilet Room (TJ HS): Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.</p>	<p>Modify boy's restroom C200 to establish 36 inch minimum between the walls between the entrance door and the toilets and sinks.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage ADA Restroom and Shower (TJ HS): Signs shall be provided in accordance with 216 and shall comply with 703. The classroom needs ADA Signage that indicates accessible shower stall.</p>	<p>Install ADA Restroom and shower outside of Rom C111</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Entrance Location (TJ HS): Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol</p>	<p>Exterior Doors Accessible Route to Entrance signage</p>	<p>Upload photo documentation to CASA.</p>		

of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.				
Signage for Locker Room – Old Field House (TJ HS): Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.	Signage indicating ADA accessible shower stall.	Upload photo documentation to CASA.		
Signage at TJAC (TJ HS): Signage on exterior of the locker rooms needs ADA Signage that indicates non-accessible shower stall.	Signage outside Varsity Boys Locker Room D131, Room 110, and Room 120	Upload photo documentation to CASA.		
Parking (Kirn MS): Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.	North parking lot will need to add 1 ADA space for a total of three, with 1 space being ADA van accessible The parking lot will need to install with the appropriate van accessible signage.	Upload photo documentation to CASA.		
Bus Loading Zone (Kirn MS): International Symbol of Accessibility. The International Symbol of	The bus loading needs to include ADA Accessible signage.	Upload photo documentation to CASA.		

<p>Accessibility shall comply with Figure 703.7.2.1.</p>				
<p>Accessible Route – Handrails (Kirn MS): Handrails provided along walking surfaces complying with 403, required at ramps complying with 405, and required at stairs complying with 504 shall comply with 505.</p>	<p>The extended surface prevents wheelchair casters and crutch tips from slipping off the ramp surface.</p> <p>A curb or barrier shall be provided that prevents the passage of a 4 inch (100 mm) diameter sphere, where any portion of the sphere is within 4 inches (100 mm) of the finish floor or ground surface.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Toilet Room Grab Bars (Kirn MS): Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>	<p>Install grab bars and signage for kitchen bathroom</p>	<p>Upload photo documentation to CASA.</p>		

<p>Toilet Room (Kirn MS): Except as provided in 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum.</p>	<p>Modify boy's restroom C200 to establish 36 inch minimum between the walls between the entrance door and the toilets and sinks.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Exposed Pipes and Surfaces Kitchen (Kirn MS): Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>	<p>Cover the exposed drain pipes under the sink in the kitchen</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Entrance Location (Kirn MS): Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.</p>	<p>Exterior Doors Accessible Route to Entrance signage</p>	<p>Upload photo documentation to CASA.</p>		
<p>Indoor Accessible Route – AED (Kirn MS): South Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm)</p>	<p>AED by Door 115 must have an object more than 27 inches below the AED</p>	<p>Upload photo documentation to CASA.</p>		

maximum horizontally into the circulation path.				
Signage – Locker Room (Kirn MS): Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.	Install signage indicating ADA accessible shower stall.	Upload photo documentation to CASA.		
Parking (Wilson MS): Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.	North parking lot will need to add 2 ADA space for a total of 6, with 2 spaces being ADA van accessible. The parking lot will need to install with the appropriate van accessible signage.	Upload photo documentation to CASA.		
Bus Loading Zone (Wilson MS): International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.	The bus loading needs to include ADA Accessible signage.	Upload photo documentation to CASA.		
Signage for Entrance Location (Wilson MS): Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.	Exterior Doors Accessible Route to Entrance signage.	Upload photo documentation to CASA.		

Signage (Wilson MS): Girls Locker Room Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.	Install signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.	Upload photo documentation to CASA.		
Exposed Pipes and Surfaces Girls Locker Room (Wilson MS): Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.	Cover the exposed drain pipes under the sink in the girls locker room.	Upload photo documentation to CASA.		
VII. Work-Study, Cooperative Programs and Job Placement				
Work-Study, Cooperative Programs and Job Placement. OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	<p>The Job Shadow Training agreement must include the contact information of the equity coordinator following the notice of nondiscrimination.</p> <p>The Intern Training Agreement must include the contact information of the equity coordinator following the notice on nondiscrimination.</p> <p>The Registered Apprenticeship Program Standards Handbook must include the notice of nondiscrimination and contact information.</p>	<p>A revised Job Shadow Training agreement with complete contact information of the equity coordinator following the notice on nondiscrimination.</p> <p>A revised Intern Training Agreement with complete information of the equity coordinator following the notice on nondiscrimination.</p> <p>A revised Registered Apprenticeship Program Standards Handbook with complete information of the equity coordinator following the notice on nondiscrimination.</p>		11/15/24

	<p>On the Job Learning and Evaluation handouts for welding, early childhood education, culinary and certified nursing assistant must include the notice of nondiscrimination and contact information.</p>	<p>A revised On the Job Learning and Evaluation handouts for welding, early childhood education, culinary and certified nursing assistant with complete information of the equity coordinator following the notice on nondiscrimination.</p>		
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Signature of Superintendent

Date

Davenport Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

T.J. Schneckloth, Superintendent
Davenport Community School District
1702 N Main Street
Davenport, IA 52803Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Schneckloth:

As a recipient of federal financial assistance, Davenport Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Davenport CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Davenport CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 27.18% for CTE Concentrators.
- **Indicator B:** Davenport CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 25.16% for CTE Concentrators.
- **Indicator C:** Davenport CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 52.34% for CTE Concentrators.
- **Indicator D:** Davenport CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 26.17% for CTE Concentrators.

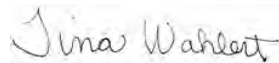
District Responsibilities

- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Eric Heitz, Administrative Consultant, Bureau of School Improvement, at eric.heitz@iowa.gov or (515) 326-1018.
- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Eric Heitz, Administrative Consultant, Bureau of School Improvement, at eric.heiz@iowa.gov or (515) 326-1018.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).



Foust, Zacchary <zacchary.foust@iowa.gov>

to schneckloth, Kimberly, SueAnn, Eric, Scott, Michael ▾

📧 Wed, Apr 10, 3:51 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



Department of Education

2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 11, 2024

Mr. T.J. Schneckloth, Superintendent
Davenport Community School District
1702 N Main Street
Davenport, IA 52803Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Schneckloth:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Davenport Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). The purpose of the review was to determine the district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Davenport CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Davenport CSD for an equity review are as follows:

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Davenport CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Davenport CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Davenport CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 27.18 percent for CTE Concentrators.
- Indicator B: Davenport CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 25.16 percent for CTE Concentrators.
- Indicator C: Davenport CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 52.34 percent for CTE Concentrators.
- Indicator D: Davenport CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 26.17 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Davenport CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong

recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Daniel Gosa, Davenport CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Davenport Community School District

Letter of Findings



October 11, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Davenport CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Davenport CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Davenport CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Davenport CSD has appropriately implemented and communicated the grievance procedures in school board policy number 103.02.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Davenport CSD School Board policy number 104A includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Davenport CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented recruitment and promotional activities. Evidence included a power point reviewing the enrollment data by gender and ethnicity and number of work-based learning experiences for the past three years.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On May 21st and 22nd, 2024, DE consultants, Scott Dryer and Mike Wright, and Josh Urmanski from the Davenport CSD reviewed the Davenport Community School District Davenport, Iowa. This review included Central High School, North High School, West High School, Williams Middle School, Wood Junior High School, and Walcott Intermediate School buildings.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

West High School, 3505 W. Locust St. Davenport, IA 52804

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1960	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 1968, 1970, 1977, 1999, 2001, 2003	1991 ADA Standards

The items to be addressed on West High School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Signage – Toilet Rooms: appropriate signage and plumbing coverage as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	Due to construction, the parking configurations will be changing upon the completion of the project. A plan for parking is in writing at this time, but as adjustments are made, please following the mandatory guidelines for parking, appropriate number of ADA spaces and van assessible spaces, signage, and assessable routes.	4.6 4.30	<p>Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.</p> <p>Parking space identification signs shall include the International Symbol of</p>

			<p>Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve.</p>
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	4.30	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Toilet Room	Signage and/or grab bar as needed for each room Room 627	4.30 4.16.4	<p>The International Symbol of Accessibility</p> <p>Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p>

Signage	Girls locker room	4.30	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Signage	Exterior doors	4.30	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

Central High School, 1120 Main Street, Davenport, IA 52803

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1904	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 1929, 1959, 1984, 2008, 2016	2010 ADA Standards

The items to be addressed on Central High School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Elevator: lights and sound requirements
- Interior Accessible Route: AED protrusion by door 115
- Toilet Rooms: appropriate signage and plumbing coverage as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description

			one with tactile characters, shall be provided.
Toilet Room	Room 410 Grab Bar Room 432 Room 426	609	Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.
Signage	9SW, 11W, and 5E outside doors – ADA for events only	703.7.2.1	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Signage	Exterior Doors Accessible Route - Entrance	216.6	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

Signage	Boys and girls pool locker room	216.6	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
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North High School, 626 W 53rd Street, Davenport, IA 52806

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1904	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 1929, 1959, 1984, 2008, 2016	2010 ADA Standards

The items to be addressed on North High School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage
- Floor and Ground: speed bumps as noted
- Door Hardware: handles as noted
- Toilet Rooms: appropriate signage and plumbing coverage as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	<p>The east parking lot has 194 stalls with 0 ADA accessible. The parking lot will need to add 6 ADA parking stall with 2 of them ADA van accessible and the appropriate signage installed.</p> <p>The west parking lot has 237 stalls with 5 ADA assessible. The parking lot will need 2 more ADA accessible stalls with 1 being ADA Van assessible, and the appropriate signage installed.</p> <p>The staff parking lot by room E8 has 11 stalls with 0 ADA accessible. The parking lot will need 1 ADA assessible stall with the</p>	<p>208.2</p> <p>502.6</p>	<p>Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.</p> <p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be</p>

	appropriate signage installed.		60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	503	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Floor and Ground Surfaces	Speed bumps	302 & 303	Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.
Door and Gate Hardware	Gym door handles Auto shop	407.2.2.1 309.4	Handles, pulls, latches, locks, and other operable parts on doors and gates shall comply with 309.4. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.
Toilet Room	Signage and/or grab bar as needed for each room Room 319 Room 339 Room 571 Room 573 Room 601 Room 603	703.7.2.1 609	The International Symbol of Accessibility. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.

Signage	Room 546 Room 553 Room 555	606.5 703	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Signage	9SW, 11W, and 5E outside doors and performing arts center – ADA for events only	703.7.2.1	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Signage	Exterior doors accessible route	216.6	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

Williams Junior High, 3040 N Division Street, Davenport, IA 52804

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1954	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 1963, 2002, 2008	1991 ADA Standards

The items to be addressed on Williams Middle School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage.
- Stage, Boys and Girls Locker Rooms, and Football Locker Room: noncompliant.
- Accessible Route: handrails for SW Entrance as noted.
- Toilet Rooms: appropriate signage and plumbing coverage as noted.
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	The north parking lot has 78 stalls. The parking lot will need to add 2 ADA parking stall with 1 of them ADA van accessible and the appropriate signage installed. One van assessible sign is difficult to read as it is near a bush.	4.6 4.30	Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	4.30	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
General Accessibility	Stage area	4.3	Need a written plan as the stage was built prior to 1977.
General Accessibility	Boys and girls locker rooms	4.35	Locker rooms noncompliant for ADA accessibility for toilet and shower accessibility.

General Accessibility	Football locker rooms	4.35	Locker rooms noncompliant for ADA accessibility for toilet and shower accessibility.
Accessible Route	Handrails - southwest entrance	4.26	A curb or barrier shall be provided that prevents the passage of a 4 inch (100 mm) diameter sphere, where any portion of the sphere is within 4 inches (100 mm) of the finish floor or ground surface.
Toilet Room	Grab bars and exposed pipes Staff Only Lower Level	4.19.4	Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.
Signage	Female staff restroom 8 th boys restroom Special needs restroom CTE classrooms	4.30	Signs shall comply with 703. Where both visual and <i>tactile characters</i> are required, either one sign with both visual and <i>tactile</i> .
Signage	Exterior doors accessible route – entrance	4.30	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying

			with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
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Walcott Elementary and Intermediate, 545 E. James Street Walcott, Iowa 52773

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1956	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 1958, 1961, 1970, 2001, 2012	2010 ADA Standards

The items to be addressed on Walcott Elementary and Intermediate campus are listed below.

- Parking: update appropriate signage.
- Bus Loading Zone: signage
- Interior Accessible Route: AED protrusion by door 115
- Toilet Rooms: appropriate signage and plumbing coverage as noted
- Toilet Rooms: exposed pipes as noted
- Signage: girls locker room as noted
- Door and Gate Hardware: orchestra door handles as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	Signage	502.6	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	503	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Signage	Sign on pillars where applicable	703.7.2.1	Where not all entrances comply with 404, entrances

			complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
Protruding Objects	AED in the main entrance	307.2	Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.
Toilet Room	Nurses office	703.7.2.1	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.
Toilet Room	Exposed pipes and surfaces Room 313 Room 318	606.5	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.
Signage	Exterior doors accessible route – entrance	216.6	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

Signage	Boys and girls locker room	216.6	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Door and Gate Hardware	Orchestra door handles	407.2.2.1	Handles, pulls, latches, locks, and other operable parts on doors and gates shall comply with 309.4.
		309.4	Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.

Wood Junior High, 5701 N Division Street, Davenport, IA 52806

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1984	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 2002, 2014	2010 ADA Standards

The items to be addressed on Woods Middle School campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage as noted.
- Door and Gate Hardware: orchestra room as noted.
- Toilet Rooms: appropriate signage and plumbing coverage as noted.
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	The parking lot has 91 stalls with 0 ADA accessible. The parking lot will need to add 4 ADA parking stall with 1 of them ADA van accessible and the appropriate signage installed.	208.2	Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.
	The staff parking lot has 99 stalls with 3 ADA assessible. The parking lot will need 2 more ADA accessible stalls with 1	502.6	

	<p>being ADA Van assessable, and the appropriate signage installed.</p> <p>The parking lines should also be repainted to allow all visitors and staff to clearly identify the parking spaces available.</p>		<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p>
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage by room 4E	503	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Toilet Room	Nurses office signage	703.7.2.1	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.
Toilet Room	<p>Room 131 – girls restroom signage for ADA</p> <p>Girls restroom main</p>	703.7.2.1	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.
Toilet Room	6 th Boys and girls restrooms	603	<p>Not ADA compliant at this time. See ADA Standards section 603 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Clearance/Size • Grab Bars • Dispensers • Approach/Toe Clearance • Exposed Pipes

Door and Gate Hardware	Orchestra door handles	407.2.2.1 309.4	Handles, pulls, latches, locks, and other operable parts on doors and gates shall comply with 309.4. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.
Toilet Room	Exposed pipes and surfaces Boys locker room	606.5	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.
Signage	Boys locker room	216.6	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Signage	Exterior doors accessible route – entrance	216.6	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- West High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.
- Central High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.
- North High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.
- Williams Middle School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.
- Walcott Elementary and Intermediate School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.
- Wood Junior High School has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates school board policy 102D and Section 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented strategies and school board policy 401.01 to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Davenport CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Davenport Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
West High School				
Parking	Due to construction, the parking configurations will be changing upon the completion of the project. A plan for parking is in writing at this time, but as adjustments are made, please following the mandatory guidelines for parking, appropriate number of ADA spaces and van assessable spaces, signage, and assessable routes.	Upload photo documentation to CASA.		
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Toilet Room	Signage and/or grab bar as needed for each room	Upload photo documentation to CASA.		

	Room 627			
Signage	Girls locker room	Upload photo documentation to CASA.		
Signage	Exterior doors	Upload photo documentation to CASA.		
Central High School				
Parking	<p>The north parking lot has 120 stalls with 0 ADA accessible. The parking lot will need to add 5 ADA parking stall with 2 of them ADA van accessible and the appropriate signage installed.</p> <p>The northwest parking lot has 85 stalls with 0 ADA assessible. The parking lot will need 4 ADA accessible stalls with 1 being ADA Van assessible, and the appropriate signage installed.</p> <p>The west parking lot has 88 stalls with 0 ADA accessible. The parking lot will need 4 ADA assessible stalls with 1 being Van assessible, and the appropriate signage installed.</p>	Upload photo documentation to CASA.		

Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Elevator	Elevator 4 – Lights and Sound	Upload photo documentation to CASA.		
Toilet Room	Room 404 Signage	Upload photo documentation to CASA.		
Toilet Room	Room 410 Grab Bar Room 432 Room 426	Upload photo documentation to CASA.		
Signage	9SW, 11W, and 5E outside doors – ADA for events only	Upload photo documentation to CASA.		
Signage	Exterior Doors Accessible Route - Entrance	Upload photo documentation to CASA.		
Signage	Boys and girls pool locker room	Upload photo documentation to CASA.		
North High School				
Parking	<p>The east parking lot has 194 stalls with 0 ADA accessible. The parking lot will need to add 6 ADA parking stall with 2 of them ADA van accessible and the appropriate signage installed.</p> <p>The west parking lot has 237 stalls with 5 ADA assessible. The parking lot will need 2 more ADA accessible stalls with 1 being ADA Van assessible,</p>	Upload photo documentation to CASA.		

	<p>and the appropriate signage installed.</p> <p>The staff parking lot by room E8 has 11 stalls with 0 ADA accessible. The parking lot will need 1 ADA assessible stall with the appropriate signage installed.</p>			
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Floor and Ground Surfaces	Speed bumps	Upload photo documentation to CASA.		
Door and Gate Hardware	Gym door handles Auto shop	Upload photo documentation to CASA.		
Toilet Room	<p>Signage and/or grab bar as needed for each room</p> <p>Room 319 Room 339 Room 571 Room 573 Room 601 Room 603</p>	Upload photo documentation to CASA.		
Signage	Room 546 Room 553 Room 555	Upload photo documentation to CASA.		
Signage	9SW, 11W, and 5E outside doors and performing arts center – ADA for events only	Upload photo documentation to CASA.		

Signage	Exterior doors accessible route	Upload photo documentation to CASA.		
Williams Junior High School				
Parking	The north parking lot has 78 stalls. The parking lot will need to add 2 ADA parking stall with 1 of them ADA van accessible and the appropriate signage installed. One van assessible sign is difficult to read as it is near a bush.	Upload photo documentation to CASA.		
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
General Accessibility	Stage area	Upload photo documentation to CASA.		
General Accessibility	Boys and girls locker rooms	Upload photo documentation to CASA.		
General Accessibility	Football locker rooms	Upload photo documentation to CASA.		
Accessible Route	Handrails - southwest entrance	Upload photo documentation to CASA.		
Toilet Room	Grab bars and exposed pipes Staff Only Lower Level	Upload photo documentation to CASA.		
Signage	Female staff restroom 8th boys restroom Special needs restroom CTE classrooms	Upload photo documentation to CASA.		

Signage	Exterior doors accessible route – entrance	Upload photo documentation to CASA.		
Walcott Elementary and Intermediate				
Parking	Signage	Upload photo documentation to CASA.		
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Signage	Sign on pillars where applicable	Upload photo documentation to CASA.		
Protruding Objects	AED in the main entrance	Upload photo documentation to CASA.		
Toilet Room	Nurses office	Upload photo documentation to CASA.		
Toilet Room	Exposed pipes and surfaces Room 313 Room 318	Upload photo documentation to CASA.		
Signage	Exterior doors accessible route – entrance	Upload photo documentation to CASA.		
Signage	Boys and girls locker room	Upload photo documentation to CASA.		
Door and Gate Hardware	Orchestra door handles	Upload photo documentation to CASA.		
Wood Junior High School				
Parking	The parking lot has 91 stalls with 0 ADA accessible. The parking lot will need to add 4 ADA parking stall with 1	Upload photo documentation to CASA.		

	<p>of them ADA van accessible and the appropriate signage installed.</p> <p>The staff parking lot has 99 stalls with 3 ADA assessible. The parking lot will need 2 more ADA accessible stalls with 1 being ADA Van assessible, and the appropriate signage installed.</p> <p>The parking lines should also be repainted to allow all visitors and staff to clearly identify the parking spaces available.</p>			
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage by room 4E	Upload photo documentation to CASA.		
Toilet Room	Nurses office signage	Upload photo documentation to CASA.		
Toilet Room	Room 131 – girls restroom signage for ADA Girls restroom main	Upload photo documentation to CASA.		
Toilet Room	6th Boys and girls restrooms	Upload photo documentation to CASA.		
Door and Gate Hardware	Orchestra door handles	Upload photo documentation to CASA.		
Toilet Room	Exposed pipes and surfaces	Upload photo documentation to CASA.		

	Boys locker room			
Signage	Boys locker room	Upload photo documentation to CASA.		
Signage	Exterior doors accessible route – entrance	Upload photo documentation to CASA.		

Signature of Superintendent

Date

Eddyville-Blakesburg- Fremont Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Scott Williamson, Superintendent
Eddyville-Blakesburg-Fremont Community School District
222 Walnut St.
Eddyville, Iowa 52553

Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Williamson:

As a recipient of federal financial assistance, Eddyville-Blakesburg-Fremont Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Eddyville-Blakesburg-Fremont CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Eddyville-Blakesburg-Fremont CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 39.17% for CTE Concentrators.
- **Indicator B:** Eddyville-Blakesburg-Fremont CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 31.48% for CTE Concentrators.
- **Indicator C:** Eddyville-Blakesburg-Fremont CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 70.66% for CTE Concentrators.
- **Indicator D:** Eddyville-Blakesburg-Fremont CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 35.33% for CTE Concentrators.

District Responsibilities

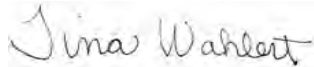
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Sara Nickel, Consultant, Bureau of School Improvement, at sara.nickel@iowa.gov or (515) 971-7558.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Support, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort is greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Sara Nickel, School Improvement Consultant, Bureau of School Improvement, at sara.nickel@iowa.gov or (515) 971-7558.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement, Division of Learning and Results
Iowa Department of Education

CC: Kimberly Buryanek, Administrator, Division of PK0-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Sara Nickel, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter ↳ Inbox



Foust, Zacchary <zacchary.foust@iowa.gov>

to scott.williamson, Kimberly, SueAnn, Eric, Scott, Michael, Sara

Wed, Apr 10, 3:21PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



Department of Education

2 Attachments • Scanned by Gmail



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 9, 2024

Scott Williamson, Superintendent
Eddyville-Blakesburg-Fremont Community School District
222 Walnut St.
Eddyville, IA 52553Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Williamson:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Eddyville-Blakesburg-Fremont Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Eddyville-Blakesburg-Fremont High School and Middle School as both are included within the same building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Eddyville-Blakesburg-Fremont CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Eddyville-Blakesburg-Fremont CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

Eddyville-Blakesburg-Fremont CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Eddyville-Blakesburg-Fremont CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Eddyville-Blakesburg-Fremont CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 39.17 percent for CTE Concentrators.
- Indicator B: Eddyville-Blakesburg-Fremont CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 31.48 percent for CTE Concentrators.
- Indicator C: Eddyville-Blakesburg-Fremont CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 70.66 percent for CTE Concentrators.
- Indicator D: Eddyville-Blakesburg-Fremont CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 35.33 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.


All required corrective actions must be included in Eddyville-Blakesburg-Fremont CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for

completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Curt Houk, Eddyville-Blakesburg-Fremont CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Eddyville-Blakesburg-Fremont Community School District

Letter of Findings



October 9, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Eddyville-Blakesburg-Fremont CSD is published and contains career and technical education (CTE) programs. All required protected classes are listed for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Eddyville-Blakesburg-Fremont CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Eddyville-Blakesburg-Fremont CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Eddyville-Blakesburg-Fremont CSD has appropriately implemented and communicated the grievance procedures in school board policy number 106.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Eddyville-Blakesburg-Fremont CSD School Board policy number 106 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Eddyville-Blakesburg-Fremont CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On August 7, 2024, DE consultants Mike Wright and SueAnn Johnson and Andy Heinle from Eddyville-Blakesburg-Fremont CSD reviewed the Eddyville-Blakesburg-Fremont CSD in Eddyville, Iowa. This review included Eddyville-Blakesburg-Fremont High School and Middle School as both are included within the same building.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Eddyville-Blakesburg-Fremont CSD – 1301 Berdan Street, Eddyville, IA 52553

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1961	Programs within facility must be readily accessible.
Additions and renovation	Additions and renovations in 1985 and 2004	1991 ADA Standards

The items to be addressed on Eddyville-Blakesburg-Fremont campus are listed below.

- Parking: need appropriate number of accessible and van accessible parking stalls, with appropriate signage
- Bus Loading Zone: signage as noted
- Accessible Route: greenhouse, Cafeteria Platform, and others as noted
- Telephone: outside the office
- Built-In-Elements: office counter height as noted
- Toilet Rooms: appropriate signage, grab bars, and plumbing coverage as noted
- Operable Parts: door knobs as noted
- Locker Room: non-accessible for JH Boys. HS Girls and Coaches as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, and other signage needed as noted

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description

Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	<p>The students parking lot is mostly gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time. There are 12 spaces adjacent are paved. In the paved area, 6 spaces are designated as ADA accessible.</p> <p>The parking between the main building and the baseball field are gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time. There is 1 ADA parking sign affixed to a grey classroom in the general parking area, but is also gravel.</p> <p>The Northeast parking lot is gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA</p>	4.1.2	<p>If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.</p> <p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people</p>

	van accessible spaces was not possible at this time. There is currently a sign for "Parent Pickup" on the east side of the lot. Best practice would be to remove this sign as this is no longer a parent pickup route.		can be seen from a driver's seat if the signs are mounted high enough above the ground and located at the front of a parking space.
Bus Loading Zone	The bus loading zone needs to include ADA Accessible signage.	4.1	Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.
Accessible Routes	Raised Platform with spotlight in the cafeteria	4.3.2	At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility.
Accessible Routes – Changes in Level	Greenhouse	4.5.2	Changes in level up to 1/4 in (6 mm) may be vertical and without edge treatment.
Telephone	Telephone in main lobby	4.31.3	<p>The highest operable part of the telephone shall be within the reach ranges specified in 4.2.5 or 4.2.6.</p> <p>Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm). The minimum low forward reach is 15 in (380 mm).</p> <p>Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor</p>

Built-In-Elements	Counter height for student access to main office	4.2.5, 4.2.6	<p>Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm). The minimum low forward reach is 15 in (380 mm).</p> <p>Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in (230 mm) above the floor</p>
Toilet Room	Faculty Restrooms JH boys and girls restrooms South boys and girls restrooms Other restrooms as noted during the site visit	<p>4.1</p> <p>4.16.4</p> <p>4.19.4</p>	<p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Grab Bars. The diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.</p> <p>Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.</p>
Operable Parts	Door knobs Staff lounge	4.27.4	Controls and operating mechanisms shall be

	Greenhouse All other rooms with noncompliant knobs		operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).
Locker Room	JH boys locker room HS girls locker room Coaches locker room	4.35	Not ADA compliant at this time. See ADA Standards section 803 for requirements. Items include but not limited to: <ul style="list-style-type: none"> • Turning Space • Signage • Toilets • Showers • Exposed Pipes
Signage	All exterior doors Accessible route – entrance	4.1	Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility. Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance).

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Eddyville-Blakesburg-Fremont CSD has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates school board policy 105 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Recommendations:

- Section 504 requires the use of evaluation procedures that ensure that children are not misclassified, unnecessarily labeled as having a disability, or incorrectly placed, based on inappropriate selection, administration, or interpretation of evaluation materials. School districts must follow the requirements for evaluation specified in the Section 504 regulatory provision at 34 C.F.R. 104.35. It is recommended that the district review the following resources and reach out to the district's legal counsel to further specify Section 504 policies relating to the evaluation process and procedures:
 - [Iowa Department of Education 504 webpage](#)
 - [Protecting Students with Disabilities](#) (US Department of Education, Office for Civil Rights)

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district is working to ensure student workplace experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented strategies and school board policy 401, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Eddyville-Blakesburg-Fremont CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Eddyville-Blakesburg-Fremont Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.		
Parking. If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in	The students parking lot is mostly gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van	Upload photo documentation to CASA.		

<p>conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.</p> <p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people can be seen from a driver's seat if the signs are mounted high enough above the ground and located at the front of a parking space.</p>	<p>accessible spaces was not possible at this time. There are 12 spaces adjacent are paved. In the paved area, 6 spaces are designated as ADA accessible.</p> <p>The parking between the main building and the baseball field are gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time. There is 1 ADA parking sign affixed to a grey classroom in the general parking area, but is also gravel.</p> <p>The Northeast parking lot is gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time. There is currently a sign for "Parent Pickup" on the east side of the lot. Best practice would be to remove this sign as this is no longer a parent pickup route.</p>			
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<p>Bus Loading Zone. Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p>	<p>The bus loading zone needs to include ADA accessible signage.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Accessible Routes. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements and with all accessible dwelling units within the building or facility.</p>	<p>Raised platform with spotlight in the cafeteria Greenhouse</p>	<p>Upload photo documentation to CASA.</p>		
<p>Accessible Routes – Changes in Level. Changes in level up to 1/4 in (6 mm) may be vertical and without edge treatment.</p>	<p>Telephone in main lobby</p>	<p>Upload photo documentation to CASA.</p>		
<p>Telephone. The highest operable part of the telephone shall be within the reach ranges specified in 4.2.5 or 4.2.6.</p> <p>Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 in (1220 mm). The minimum low forward reach is 15 in (380 mm).</p> <p>Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be</p>	<p>Counter height for student access to main office</p>	<p>Upload photo documentation to CASA.</p>		

no less than 9 in (230 mm) above the floor				
<p>Toilet Rooms. Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Grab Bars. The diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.</p> <p>Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.</p>	<p>Faculty restrooms</p> <p>JH boys and girls restrooms</p> <p>South boys and girls restrooms</p> <p>Other restrooms as noted during the site visit</p>	<p>Upload photo documentation to CASA.</p>		
<p>Operable Parts – Door Handles. Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).</p>	<p>All rooms with noncompliant knobs</p>	<p>Upload photo documentation to CASA.</p>		
<p>Locker Rooms. Not ADA compliant at this time. See ADA</p>	<p>JH boys locker room</p>	<p>Upload photo documentation to CASA.</p>		

<p>Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Turning Space • Signage • Toilets • Showers <p>Exposed Pipes</p>	<p>HS girls locker room</p> <p>Coaches locker room</p>			
<p>Signage. Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance).</p>	<p>All exterior doors – Accessible route to entrance signage.</p>	<p>Upload photo documentation to CASA.</p>		

Signature of Superintendent

Date

Lamoni Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Chris Coffelt, Superintendent
Lamoni Community School District
202 North Walnut
Lamoni, IA 50140Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Coffelt:

As a recipient of federal financial assistance, Lamoni Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Lamoni CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Lamoni CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 11.19% for CTE Concentrators.
- **Indicator B:** Lamoni CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 24.76% for CTE Concentrators.
- **Indicator C:** Lamoni CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 35.95% for CTE Concentrators.
- **Indicator D:** Lamoni CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 17.98% for CTE Concentrators.

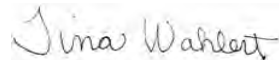
District Responsibilities

- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.
- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Pam Spangler, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter

External

Inbox x

Letters x



Foust, Zacchary <zacchary.foust@iowa.gov>

to ccoffelt, Kimberly, SueAnn, Eric, Scott, Michael, Pam

Wed, Apr 10, 3:43 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



Department of Education

2 Attachments • Scanned by Gmail



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 4, 2024

Chris Coffelt, Superintendent
Lamoni Community School District
202 North Walnut
Lamoni, IA 50140Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Coffelt:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Lamoni Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Lamoni High School, Middle School, and Elementary school are all included within the same building, all were included in the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Lamoni CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Lamoni CSD for an equity review are as follows:

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Lamoni CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2023-2024. Below is a summary of Lamoni CSD's data for students who were calculated to be CTE Concentrators in the 2022-2023 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Lamoni CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 11.19 percent for CTE Concentrators.
- Indicator B: Lamoni CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 24.76 percent for CTE Concentrators.
- Indicator C: Lamoni CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 35.95 percent for CTE Concentrators.
- Indicator D: Lamoni CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 17.98 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Lamoni CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong

recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Nate Pierschbacher, Lamoni CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Lamoni Community School District

Letter of Findings



September 4, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Lamoni CSD is published and contains CTE programs. All required protected classes for educational programs are present. The name of the Equity Coordinator and their email address must be added to the notice.

Required Corrective Action(s):

- The name of the Equity Coordinator, along with all contact information, is required with each notice. Lamoni CSD will correct the notice to include the Equity Coordinator's name, title, address, phone number, and email address.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Lamoni CSD is appropriately communicated and contains all required protected classes for both programs and employment. The name of the Equity Coordinator and their email address must be added to the notice.

Required Corrective Action(s):

- The name of the Equity Coordinator, along with all contact information, is required with each notice. Lamoni CSD will correct the notice to include the Equity Coordinator's name, title, address, phone number, and email address.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Lamoni CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Lamoni CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102. Lamoni CSD School Board policy number 102 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Lamoni CSD has appropriately implemented and communicated the grievance procedures in school board policy number 104. Lamoni CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Lamoni CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Recommendations:

- Consider adding the number of credits or length of the class (semester, full year) in the course book.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD does not indicate the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- Lamoni CSD needs to produce a written explanation of how counseling services are implemented for students with limited English-speaking ability or hearing impairments.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On June 12, 2024, DE consultant Mike Wright, Raf Coulthard, and Chris Coffelt reviewed the Lamoni CSD in Lamoni, Iowa. This review included Lamoni High School, Middle School, and Elementary school, as all are included within the same building. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Lamoni CSD, 202 N Walnut Street, Lamoni, IA, 50140

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1940	Programs within facility must be readily accessible.
Addition	Additions and Renovations in 1960, 1993, 2006, and 2012. The Ag Shop was added in 1985.	2010 ADA Standards

The items to be addressed on Woodbury Central campus are listed below.

- Parking: Need appropriate number of accessible and van accessible parking stalls, with appropriate signage
- Toilet Rooms: Elementary Building, 1st floor, need written plan to address non-accessible restrooms
- Toilet Rooms: Elementary Building, 2nd floor restrooms need appropriate signage
- Toilet Room: Agriculture Building
- Accessible Route: From the main building to the Agriculture Building
- Accessible Route/Change in Level: Hallway between the Agriculture Building and Greenhouse
- Operable Parts: Door knobs as noted for the door separating the Agriculture Building and Greenhouse
- Signage: Need appropriate accessible and non-accessible signs, with an arrow to the accessible entrance, signage needed as noted

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible.	Programs within facility must be readily accessible.
Parking and Accessible Route	<p>The parking lot by the Agriculture Building and Greenhouse is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time. A calculation of parking spaces has been shared with the superintendent and building and grounds director.</p> <p>The Northeast parking area is gravel. It appeared as though there are 5 spaces, but appropriate calculations should be completed to assure accuracy. One of the spaces, regardless of the total number, will need to be designated as ADA accessible and have the appropriate signage.</p> <p>The West parking area has 10 total parking spaces and 0 ADA accessible spaces. One space needs to be designated as ADA Accessible and appropriate signage needs to be installed.</p>	<p>208.2</p> <p>206.2</p> <p>302</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>Within a site, at least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site. A route from the main building to the Agriculture Building and Greenhouse needs to be designated as ADA accessible.</p> <p>Floor and ground surfaces shall be stable, firm, and slip resistant and shall comply with 302. Given the potential for noncompliance and the importance of accessible</p>

	The Northwest parking area has 14 total spaces. There is 1 space that has painting on the ground indicating an ADA accessible space, but there is currently no sign indicating ADA accessibility. An ADA Accessible sign needs to be installed.		parking as an initial step towards accessing a program, it is a priority for the district to address this issue to ensure accessibility for individuals with disabilities.
General Accessibility	Elementary Restrooms on the 1 st floor	603	Need a written plan as the elementary building was built prior to 1977.
Signage	Elementary Restrooms on 2 nd floor for ADA accessibility	216 703.2.1	Signs shall be provided in accordance with 216 and shall comply with 703. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Toilet Room	Agriculture Building – both Boys and Girls Restrooms	703.7.2.1 609	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.
Accessible Routes	Agriculture Building and Greenhouse	206.2.1	At least one accessible route shall be provided within the site from accessible parking spaces

		206.2.2	and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.
Accessible Routes – Changes in Level	Agriculture Building hallway between the building and the greenhouse.	303.3	Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.
Operable Parts	Agriculture Building connecting hallway to the Greenhouse – Door handle	309.4	Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.
Signage	All Exterior Doors Accessible Route - Entrance	216	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Lamoni Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were

determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates school board policy 102-EH(3) is up to date and available to ensure services for students with disabilities are receiving an equitable education. The district does not have a Section 504 Procedure Manual to assist staff and families in the process and eligibility of students in receiving a 504. The Section 504 form and parent letter do not have the notice of nondiscrimination.

Required Corrective Action(s):

- The district needs to create a District and Parent Handbook for Section 504. The district is encouraged to review other district handbooks and/or the sample handbooks found at this link on the Iowa Department of Education website, for ideas and suggestions: [Specialized support/Section 504](#)
- The Section 504 parent letter must include the notice of nondiscrimination. This should be included at the end of this letter.
- The Section 504 Accommodation Form must include the notice of nondiscrimination. This should be included at the end of this form.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Recommendations:

- It is recommended that the district work with local scholarship organizations in adding the nondiscrimination notice to their applications.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The district does not have or participate in a work study program, cooperative program, or job placement program.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD does not indicate the school district has appropriately implemented strategies to ensure equity related to employment and personnel practices. The district is missing school board policy 401. The district does not have a Hiring Manual or copies job applications for licensed and unlicensed staff with the nondiscrimination notice at the bottom of the applications.

Required Corrective Action(s):

- Submit a current school board policy (IASB Sample Policy 401) for equal employment opportunity.
- Create or submit an employment application for licensed and unlicensed staff that includes a statement of nondiscrimination, which includes notice about the grievance procedure and identity of the equity coordinator.
- Submit a notice of job openings used by the district in the past three years contain the district's nondiscrimination notification.

- Create a District Hiring Manual that describes the recruitment, hiring and assignment process. It should also include a structured process that sets guidelines for selecting and interviewing applicants for employment.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Lamoni CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Lamoni Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
<p>Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.</p> <p>Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV O and V.C.</p>	<p>The name of the equity coordinator, along with all contact information, is required with each notice. The notice must include: Equity Coordinator’s name, title, address, phone number, and email address.</p>	<p>A corrected Annual Notice of Nondiscrimination (from the website) to include all contact information for the Equity Coordinator.</p>		10/18/24
<p>Continuous Notice of Nondiscrimination.</p> <p>Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV O and V.C</p>	<p>The name of the equity coordinator, along with all contact information, is required with each notice. The notice must include: Equity Coordinator’s name, title, address, phone number, and email address.</p>	<p>A corrected Continuous Notice of Nondiscrimination (from the website) to include all contact information for the Equity Coordinator.</p>		
II. Recruitment, Admissions and Counseling				

<p>Counseling of Students with Limited English-Speaking Ability or Hearing Impairments Materials or services available to students.</p> <p>OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)</p>	<p>Procedures to ensure students of limited English-speaking ability benefit from counseling services; procedures to ensure students with hearing impairments benefit from counseling services.</p>	<p>A written explanation of how counseling services are implemented for students with limited English-speaking ability or hearing impairments.</p>		<p>10/18/24</p>
<p>III. Accessibility for Students with Disabilities</p>				
<p>Written Plan</p>	<p>For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking and Accessible Route</p>	<p>The parking lot by the Agriculture Building and Greenhouse is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time. A calculation of</p>	<p>Upload photo documentation to CASA.</p>		

	<p>parking spaces has been shared with the superintendent and building and grounds director.</p> <p>The Northeast parking area is gravel. It appeared as though there are 5 spaces, but appropriate calculations should be completed to assure accuracy. One of the spaces, regardless of the total number, will need to be designated as ADA accessible and have the appropriate signage.</p> <p>The West parking area has 10 total parking spaces and 0 ADA accessible spaces. One space needs to be designated as ADA Accessible and appropriate signage needs to be installed.</p> <p>The Northwest parking area has 14 total spaces. There is 1 space that has painting on the ground indicating an ADA accessible space, but there is currently no sign indicating ADA accessibility. An ADA</p>			
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	Accessible sign needs to be installed.			
General Accessibility	Elementary Restrooms on the 1st floor.	Upload photo documentation to CASA.		
Signage	Elementary Restrooms on 2nd floor for ADA accessibility.	Upload photo documentation to CASA.		
Toilet Room	Agriculture Building – both Boys and Girls Restrooms.	Upload photo documentation to CASA.		
Accessible Routes	Agriculture Building and Greenhouse.	Upload photo documentation to CASA.		
Accessible Routes – Changes in Level	Agriculture Building hallway between the building and the greenhouse.	Upload photo documentation to CASA.		
Operable Parts	Agriculture Building connecting hallway to the Greenhouse – Door handle.	Upload photo documentation to CASA.		
Signage	All Exterior Doors Accessible Route – Entrance.	Upload photo documentation to CASA.		
IV. Services for Students with Disabilities				
Section 504 Policies and Procedures and/or Manual. OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Create a District and Parent Handbook for Section 504. We encourage you to review other district handbooks and/or the sample handbooks found on the Iowa Department of Education website for ideas and suggestions.	Provide a written copy or link to online publication.		10/11/24

	<p>The Section 504 parent letter must include the notice of nondiscrimination. This should be included at the end of this letter.</p> <p>The Section 504 Accommodation Form must include the notice of nondiscrimination. This should be included at the end of this form.</p> <p>See Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook.</p>			
VIII. Employment				
<p>Documentation of employment practices including screening/hiring policies and procedures.</p> <p>OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61</p>	<p>The documentation provided by Lamoni CSD does not indicate the school district has appropriately implemented strategies and missing school board policy 401, to ensure equity related to employment and personnel practices. The district does not have a Hiring Manual or copies job applications for licensed and unlicensed staff with the nondiscrimination notice</p>	<p>Submit a current school board policy (See IASB Sample Policy 401) for equal employment opportunity.</p> <p>Create and submit an employment application for licensed and unlicensed staff that includes a statement of nondiscrimination, which includes notice about the grievance procedure and identity of the equity coordinator.</p>		<p>10/18/24</p>

	<p>at the bottom of the applications.</p>	<p>Submit a notice of job openings used by the district in the past three years contain the district's nondiscrimination notification.</p> <p>Create and submit a District Hiring Manual that describes the recruitment, hiring and assignment process. It should also include a structured process that sets guidelines for selecting and interviewing applicants for employment.</p>		
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Signature of Superintendent

Date

Montezuma Community School District



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Rich Schulte, Superintendent
Montezuma Community School District
504 N. 4th Street
Montezuma, IA 50171

Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Schulte:

As a recipient of federal financial assistance, Montezuma Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Montezuma CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Montezuma CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 39.15% for CTE Concentrators.
- **Indicator B:** Montezuma CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 35.43% for CTE Concentrators.
- **Indicator C:** Montezuma CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 74.58% for CTE Concentrators.
- **Indicator D:** Montezuma CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 37.29% for CTE Concentrators.

District Responsibilities

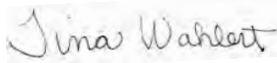
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Dennis McClain, Consultant, Bureau of School Improvement, at dennis.mcclain@iowa.gov or (515) 822-2554.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Education Program Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Dennis McClain, Consultant, Bureau of School Improvement, at dennis.mcclain@iowa.gov or (515) 822-2554.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Dennis McClain, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).



Foust, Zacchary <zacchary.foust@iowa.gov>
to rschulte, Kimberly, SueAnn, Eric, Scott, Michael, Dennis ▾

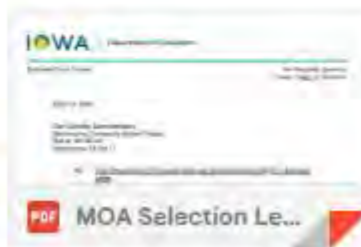
Wed, Apr 10, 3:48 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 8, 2024

Rich Schulte, Superintendent
Montezuma Community School District
504 N. 4th Street
Montezuma, IA 50171Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Schulte:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Montezuma Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Montezuma High School, Middle School, and Elementary school, as all are included within the same building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Montezuma CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Montezuma CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Montezuma CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Montezuma CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Montezuma CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 39.15 percent for CTE Concentrators.
- Indicator B: Montezuma CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 35.43 percent for CTE Concentrators.
- Indicator C: Montezuma CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 74.58 percent for CTE Concentrators.
- Indicator D: Montezuma CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 37.29 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Montezuma CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong recommendation that you choose a timeline that allows for ordering and purchasing any new

materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Jason Meyer, Montezuma CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Dennis McClain, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Montezuma Community School District

Letter of Findings



October 8, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Montezuma CSD is published and contains career and technical education (CTE) programs, and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Montezuma CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Montezuma CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Recommendations:

- Currently, the superintendent serves as the district equity coordinator. The district may want to consider assigning this duty to another staff member, as in the event of a complaint against the superintendent the district would not have an individual who directly supervises the superintendent to investigate a complaint. Additionally, the district should consider ways to provide training for the equity coordinator. Guidance for equity coordinator role, responsibilities and functions can be found on the Iowa Department of

Education website here: <https://educate.iowa.gov/pk-12/accreditation-program-approval/equity-compliance#equity-coordinator-role-and-responsibilities>

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Montezuma CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.R1.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Montezuma CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Montezuma CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On July 30, 2024, DE Administrative Consultant SueAnn Johnson and Consultant Mike Wright, Rich Schulte and Paul Hawkins from the Montezuma CSD reviewed the Montezuma CSD in Montezuma, Iowa. This review included Montezuma High School, Middle School, and Elementary school as all are included within the same building.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Montezuma CSD, 504 N. 4th Street, IA 50171

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1928	Programs within facility must be readily accessible.
Additions and renovations	1955, 1959, 1960, 1989, 2013, 2014, 2015, and 2017	2010 ADA Standards

The items to be addressed on Montezuma campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Operable Parts: door knobs as noted
- Toilet Rooms: appropriate signage, grab bars, and plumbing coverage as noted
- Changes in Level: agriculture Storage Building and Greenhouse II
- Accessible Route: greenhouse II
- Locker Room: noncompliant for JH and Varsity Boys and Girls as noted
- Counter Height: charging Station in Student Commons
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	<p>The north parking lot has 192 stalls with 5 ADA accessible. The district needs to designate 3 additional stalls as ADA accessible for a total of 8 ADA accessible stalls. Of the 8 ADA accessible stalls, 2 stalls need to be designated as ADA van accessible and the appropriate signage installed.</p> <p>The south parking lot has 78 stalls with 2 ADA accessible. The parking lot will need to designate 2 additional stalls as ADA accessible for a total of 4 ADA accessible stalls. Of the 4 ADA accessible stalls, 1 stall needs to be designated as being ADA Van accessible, and the appropriate signage installed.</p>	208.2.4	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Operable Parts	Door knobs Band Room Choir Room	309.4	Operable parts shall be operable with one hand and shall not require tight

			inches (1420 mm) minimum measured perpendicular from the rear wall.
Changes in Level	Agriculture Storage Building Greenhouse II	303	<p>Not ADA compliant at this time. See ADA Standards section 303 for requirements.</p> <p>Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.</p> <p>Changes in level between ¼ inch (6.4 mm) high minimum and ½ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2.</p>
Accessible Routes	Greenhouse II	206.2.1	At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve.
Locker Room	JH Boys and Girls Varsity Boys and Girls	803	<p>Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Signage including ADA shower accessible • Toilets • Grab bars • Showers • Exposed Pipes
Counter Height	Charging Station – Student Commons by the gym	904.3.2	The counter surface height shall be 38 inches (965 mm) maximum above the finish floor or ground.

Signage	All Exterior Doors Accessible Route - Entrance	216	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.
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IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Montezuma Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates school board policy 102 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented strategies and school board policy 401.2, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Montezuma CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Northwood-Kensett Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Michael Crozier, Superintendent
Northwood-Kensett Community School District
1496 480th Street
Northwood, IA 50459Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Crozier:

As a recipient of federal financial assistance, Northwood-Kensett Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Northwood-Kensett CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Northwood-Kensett CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 30.93% for CTE Concentrators.
- **Indicator B:** Northwood-Kensett CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 30.93% for CTE Concentrators.
- **Indicator C:** Northwood-Kensett CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 61.87% for CTE Concentrators.
- **Indicator D:** Northwood-Kensett CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 30.93% for CTE Concentrators.

District Responsibilities

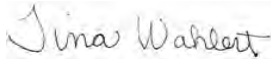
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Dennis McClain, Consultant, Bureau of School Improvement, at dennis.mcclain@iowa.gov or (515) 822-2554.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Dennis McClain, Consultant, Bureau of School Improvement, at dennis.mcclain@iowa.gov or (515) 822-2554.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Dennis McClain, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>
to mcrozier, Kimberly, SueAnn, Eric, Scott, Michael, Dennis ▾

Wed, Apr 10, 3:38 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

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Chief, Bureau of School Improvement
Iowa Department of Education
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400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 9, 2024

Michael Crozier, Superintendent
Northwood-Kensett Community School District
1496 480th Street
Northwood, IA 50459Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Crozier:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Northwood-Kensett Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included the Northwood-Kensett High School and Middle School building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Northwood-Kensett CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Northwood-Kensett CSD for an equity review are as follows:

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Northwood-Kensett CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Northwood-Kensett CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Northwood-Kensett CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 30.93 percent for CTE Concentrators.
- Indicator B: Northwood-Kensett CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 30.93 percent for CTE Concentrators.
- Indicator C: Northwood-Kensett CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 61.87 percent for CTE Concentrators.
- Indicator D: Northwood-Kensett CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 30.93 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Northwood-Kensett CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing

the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Bradley Christianson, Northwood-Kensett CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Dennis McClain, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Northwood-Kensett Community School District

Letter of Findings



October 9, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Northwood-Kensett CSD is published and contains career and technical education (CTE) programs, and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Northwood-Kensett CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Northwood-Kensett CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Northwood-Kensett CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102-R(1).

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Northwood-Kensett CSD School Board policy number 104 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Northwood-Kensett CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On July 9, 2024, DE consultant Mike Wright, and Mike Crozier from the Northwood-Kensett CSD reviewed the Northwood-Kensett CSD Northwood, Iowa. This review included the Northwood-Kensett High School and Middle School building.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Northwood-Kensett CSD, 704 7th St N, Northwood, IA 50459

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1962	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 2019 and 2022	2010 ADA Standards

The items to be addressed on Northwood-Kensett campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Toilet Rooms: appropriate signage as noted.
- Signage: the bus loading zone needs to include ADA Accessible signage.
- Elevator (LULA): appropriate audible, car control, and signage as noted.
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a	Programs within facility must be readily accessible	Programs within facility must be readily accessible

	written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.		
Parking	<p>The front parking lot has 30 stalls with 2 ADA accessible. The parking lot will need to designate 1 of the 2 stalls as an ADA van accessible and the appropriate signage installed.</p> <p>The south parking lot has 94 stalls with 6 ADA accessible. The parking lot will need to designate 2 stalls as being ADA van accessible, and the appropriate signage installed.</p> <p>The south and west parking lot has 74 stalls with 3 ADA accessible. The parking lot will need to install van accessible signage where needed</p>	208.2.4	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>Van Parking Spaces. For every six or fraction of six parking spaces required by 208.2 to comply with 502, at least one shall be a van parking space complying with 502.</p>
Toilet Room	<p>Faculty Restroom in Main Office</p> <p>Kitchen Restroom</p> <p>Cafeteria Restrooms</p>	703.7.2.1	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.
Bus Loading Zone	The bus loading zone needs to include ADA Accessible signage.	503	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Elevator – Limited	Audible Indicator	407.4.8.2	A non-verbal audible signal with a frequency of 1500 Hz

Use/Limited-Application	Signage	407.2.2	maximum which sounds as the car passes or is about to stop at a floor served by the elevator. Hall signals, including in-car signals, shall comply with 407.2.2.
	Car Controls	308	Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.
	Braille	407.4.6	Control panels shall be centered on a side wall.
		408	Where provided, elevator car controls shall comply with 407.4.6 and 309.4.
		703.3	Braille shall be contracted (Grade 2) and shall comply with 703.3 and 703.4.
Signage	All Exterior Doors (8, 9, 10, 11, 14, and others noted during the site visit) Accessible Route - Entrance	216	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Northwood-Kensett CSD has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates school board policy 102 and Section 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented strategies and school board policy 401.01, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Northwood-Kensett CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Northwood-Kensett Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
<p>III. Accessibility for Students with Disabilities</p>				
<p>Written Plan</p>	<p>For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking</p>	<p>The front parking lot has 30 stalls with 2 ADA accessible. The parking lot will need to designate 1 of the 2 stalls as an ADA van accessible and the appropriate signage installed.</p>	<p>Upload photo documentation to CASA.</p>		

	<p>The south parking lot has 94 stalls with 6 ADA accessible. The parking lot will need to designate 2 stalls as being ADA van accessible, and the appropriate signage installed.</p> <p>The south and west parking lot has 74 stalls with 3 ADA accessible. The parking lot will need to install van accessible signage where needed</p>			
Toilet Room	<p>Faculty Restroom in Main Office</p> <p>Kitchen Restroom</p> <p>Cafeteria Restrooms</p>	Upload photo documentation to CASA.		
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Elevator – Limited Use/Limited-Application	<p>Audible Indicator</p> <p>Signage</p> <p>Car Controls</p> <p>Braille</p>	Upload photo documentation to CASA.		
Signage	All Exterior Doors (8, 9, 10, 11, 14, and others noted during the site visit) Accessible Route - Entrance	Upload photo documentation to CASA.		

Signature of Superintendent

Date

Seymour Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Brad Breon, Superintendent
Seymour Community School District
100 S Park Ave.
Seymour, IA 52590Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Breon:

As a recipient of federal financial assistance, Seymour Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance;
- Proficiency percentages in Mathematics from Perkins V core indicators of performance;

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Seymour CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Seymour CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 14.58% for CTE Concentrators.
- **Indicator B:** Seymour CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 9.72% for CTE Concentrators.
- **Indicator C:** Seymour CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 24.30% for CTE Concentrators.
- **Indicator D:** Seymour CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 12.15% for CTE Concentrators

District Responsibilities

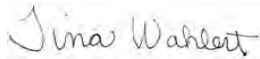
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Sara Nickel, Consultant, Bureau of School Improvement, at sara.nickel@iowa.gov or (515) 971-7558.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Sara Nickel, Consultant, Bureau of School Improvement, at sara.nickel@iowa.gov or (515) 971-7558.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
Eric Heitz, Administrative Consultant, Bureau of School Improvement
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Sara Nickel, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter Inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>
to bbreon, Kimberly, Eric, SueAnn, Scott, Michael, Sara ▾

Wed, Apr 10, 3:17 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

October 14, 2024

Scott Valentine, Superintendent
Seymour Community School District
100 South Park Avenue
Seymour, IA 52590Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Valentine:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Seymour Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Seymour High School, Middle School, and Elementary School, as all are included within the same building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Seymour CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Seymour CSD for an equity review are as follows:

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Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

Seymour CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Seymour CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Seymour CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 14.58 percent for CTE Concentrators.
- Indicator B: Seymour CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 9.72 percent for CTE Concentrators.
- Indicator C: Seymour CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 24.30 percent for CTE Concentrators.
- Indicator D: Seymour CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 12.15 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Seymour CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong recommendation that you choose a timeline that allows for ordering and purchasing any new

materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Sarah Carter-Jones, Seymour CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Seymour Community School District
Letter of Findings



October 14, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice for Seymour CSD was not submitted.

Recommendations:

- Section IV-O of the OCR Guidelines for Eliminating Discrimination in Vocational Education Programs of 1979 requires recipients of federal funding operating vocational education programs to provide an annual notice of nondiscrimination prior to the beginning of each school year to students, parents, employees, and the general public. The annual notice must include the district's CTE service areas.

Required Corrective Action(s):

- Seymour CSD will provide an annual notice which aligns with sample notices provided in the [Guidance for Nondiscrimination Notices: PK-12 Schools](#) document. The district must provide a copy of or hyperlink to an appropriate annual notice.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice for Seymour CSD was not submitted.

Recommendations:

- Section IV-O of the OCR Guidelines for Eliminating Discrimination in Vocational Education Programs of 1979 requires recipients of federal funding operating vocational education programs to provide continuous notices of nondiscrimination in major publications.

Required Corrective Action(s):

- The district will provide a continuous notice which aligns with sample notices provided in the [Guidance for Nondiscrimination Notices: PK-12 Schools](#) document. The district must provide a copy of or hyperlink to an appropriate continuous notice.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Seymour CSD did not submit any evidence.

Recommendations:

- Seymour CSD should formalize the process for designating the equity coordinator role by documenting school board action about the appointment and provide an outline of the responsibilities and activities conducted by the equity coordinator. Guidance for the equity coordinator's role, responsibilities and functions can be found on the Department's website: [Equity Coordinator Role and Responsibilities](#).

Required Corrective Action(s):

- Seymour CSD will provide evidence of the appointment of the designated equity coordinator, board agenda and minutes of the appointment, and a review of the activities conducted by the equity coordinator (reviewing data, training, reports and/or grievance process).

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Seymour CSD did not submit evidence the district has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Recommendations:

- This is a mandatory board policy. The purpose of the policy is to ensure the provisions of title VI of the Civil Rights Act of 1964 so no person be subjected to discrimination on the ground of race, color, or national origin, be excluded from participation in, or be denied the benefits of any program or activity receiving Federal financial assistance from the Department of Education.

Required Corrective Action(s):

- Seymour CSD will provide adopted board policies for nondiscrimination and whom to contact to file a grievance.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Seymour CSD did not submit any evidence.

Recommendations:

- Grievance procedures must be adopted by the board, include all of the protected classes, and include the following elements:

- Voluntary informal mechanisms (e.g. mediation) for resolving some types of complaints if the parties agree to do so are included, is it clear that step can be skipped especially in the case of sexual violence
 - Notification to complainant of the right to end the informal process at any time
 - Application of the procedures to complaints alleging discrimination carried out by employees, other students, or third parties
 - Methods for notifying students, parents, and employees of the procedures, including where complaints may be filed
 - Adequate, reliable and impartial investigation of complaints, including the opportunity to present witnesses and present evidence
 - Designated and reasonably prompt time frames for the major stages of the complaint process
 - Methods for providing written notice to the parties of the complaint
 - An assurance the school will take steps to prevent the recurrence of any discrimination and to correct its discriminatory effects on the complainant and others, if appropriate.
- If a district has more than one grievance procedure, it must be clear which one to use and when (i.e. Civil Rights Grievance, Anti-Bullying and Harassment Complaint)

Required Corrective Action(s):

- Seymour CSD will provide adopted board policies for grievance procedures including the above information.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence of the course description guide with the implemented admission criteria that allows accessibility to all students or the process for removing all prerequisite requirements to ensure all students have access.

Recommendations:

- The course description guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.

Required Corrective Action(s):

- Seymour CSD will provide the course description guide including the implemented admission criteria that allows accessibility to all students and the process for removing prerequisite requirements to ensure all students have access.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Documentation should include the school district has appropriately implemented procedures to ensure access for students with limited English language skills. Language in course and program descriptions should encourage participation of students in career and technical courses and programs where their group has been under-represented.

Required Corrective Action(s):

- Seymour CSD will submit documentation of the district's procedures for ensuring access for students with limited English language skills.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Documentation provided by Seymour CSD should indicate the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- Seymour CSD will submit the action steps and evidence counselors use to review documents and practices, align practices with guidance standards, a calendar of career planning activities, 8th grade career planning activities and documents and four-year planning documents.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should have procedures in place to ensure students of limited English-speaking ability and students who have hearing impairments benefit from counseling services.

Required Corrective Action(s):

- Seymour CSD will provide the district's procedures for ensuring students with limited English-speaking skills and students who have hearing impairments have access to counseling services.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should at minimum annually facilitate scheduled meetings to review high school course enrollment data, disaggregated by subgroup and identify steps to ensure disproportionate course enrollment does not result from unlawful discrimination.

Required Corrective Action(s):

- Seymour CSD will provide evidence of a meeting agenda and minutes ensuring an annual review of high school attendance center and course enrollment data disaggregated by subgroups and the steps the district will take to ensure disproportionate course enrollment data does not result from unlawful discrimination.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On August 6, 2024, DE consultant Mike Wright and Scott Valentine and Derick Jones from Seymour CSD reviewed Seymour CSD in Seymour, Iowa. This review included Seymour High School, Middle School, and Elementary school as all are included within the same building.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Seymour CSD – 100 S. Park Ave., Seymour IA 52590

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1903	Programs within facility must be readily accessible.
Additions and renovations	1990 and 2017	2010 ADA Standards

The items to be addressed on Seymour campus are listed below.

- Parking: appropriate number of accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: signage as noted.
- Accessible Route: greenhouse, stage access, sidewalk to ramp, and others as noted.
- Drinking Fountain: 2nd Floor as noted
- Protruding Object: AED and Stop the Bleed kits by the gym
- General Accessibility: ag shop entrance and boys and girls restrooms need a written plan as auditorium was built prior to 1977.
- Operable Parts: door knobs as noted
- Toilet Rooms: appropriate signage, grab bars, and plumbing coverage as noted
- Locker Room: noncompliant for JH and HS boys and girls as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, and other signage needed as noted.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible

<p>Parking</p>	<p>All parking lots were gravel. Consequently, calculating the number of spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time.</p> <p>The parallel parking on the front of the building included two signs designated as ADA parking stalls. The signage for these two stalls needs to be at least 60 inches above the ground from the bottom of the sign.</p>	<p>208.2.2</p> <p>206.2</p> <p>302</p>	<p>Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>Within a site, at least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site. A route from the main building to the Agriculture Building and Greenhouse needs to be designated as ADA accessible.</p> <p>Floor and ground surfaces shall be stable, firm, and slip resistant and shall comply with 302. Given the potential for noncompliance and the importance of accessible parking as an initial step towards accessing a program, it is a priority for the district to address this issue to ensure accessibility for individuals with disabilities.</p>
<p>Bus Loading Zone</p>	<p>The bus loading zone needs to include ADA accessible signage.</p>	<p>503</p>	<p>International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.</p>
<p>Accessible Routes</p>	<p>Ramp and handrails</p>	<p>405</p>	<p>Ramp runs shall have a running slope not steeper than 1:12.</p>

		505	The distance between horizontal projections and the bottom of the gripping surface shall be permitted to be reduced by 1/8 inch (3.2 mm) for each 1/2 inch (13 mm) of additional handrail perimeter dimension that exceeds 4 inches (100 mm).
Drinking Fountain	2 nd Floor – drinking fountain	602.4	Spout outlets shall be 36 inches (915 mm) maximum above the finish floor or ground.
General Accessibility	Need a written plan as auditorium was built prior to 1977.	206.2.3	Need a written plan as Auditorium was built prior to 1977.
Protruding Objects	AED and Stop the Bleed by the gym	307.2	Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.
Toilet Room	Daycare Room	603	This report acknowledges that, in addition to the elementary, middle, and high school, a daycare room exists within the same structure and, although it was not examined fully as part of this review, the reviewer notes that it does not include an ADA accessible restroom.
Toilet Room	Faculty restroom Kitchen HS staff restroom Upper and lower boys and girls restrooms Football boys and girls restrooms	703.7.2.1 609	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. Grab bars shall be installed in a horizontal position, 33

	Other restrooms as noted during the site visit	606.5	<p>inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p> <p>Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>
Operable Parts	<p>Door knobs: Band room</p> <p>Choir room</p> <p>All other rooms with noncompliant knobs</p>	309.4	Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. m.
Locker Room	<p>JH and HS boys and girls locker rooms</p> <p>Coaches locker room</p>	803	<p>Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Turning Space • Signage • Toilets • Showers • Exposed Pipes
Signage	Boys and girls cafeteria restrooms	216.2	International Symbol of Accessibility. The

			International Symbol of Accessibility shall comply with Figure 703.7.2.1. Exterior signs that provide designations, labels, or names for interior rooms or spaces where the sign is not likely to change over time.
Signage	HS girls and boys locker room	216.6	Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.
Signage	All exterior doors accessible route – entrance	216	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404. Doors can be designated as ADA Accessible for Activities Only where applicable.

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Seymour CSD has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should have policies and procedures in place to identify and address the needs of a student with a disability, and communicate to school staff the information needed to implement a written Section 504 Plan.

Required Corrective Action(s):

- Seymour CSD will provide evidence of the district's adopted board policies and procedures in place to identify and address the needs of a student with a disability, the forms utilized and where information can be located (i.e., Section 504 Procedures Manual, forms, handbooks etc.).

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should have procedures in place to provide notice of scholarships, honors or awards to its student body, procedures to ensure national origin minority persons with limited English language skills receive information in their own language and that foundation or scholarship committees working closely with the district include a nondiscrimination notice on materials.

Required Corrective Action(s):

- Seymour CSD will provide evidence of the procedures in place to provide notice of scholarships, honors or awards to its student body, procedures to ensure national origin minority persons with limited English language skills receive information in their own language and that foundation or scholarship committees working closely with the district include a nondiscrimination notice on materials.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.

Required Corrective Action(s):

- Seymour CSD will provide a list of workplace-based education programs, the contracts utilized with all employers or other sponsors offering work-study cooperative education, job placement and apprenticeship programs; and the materials students complete to obtain these positions.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should have appropriate implementation strategies and school board policies 102 and 405.02, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- Seymour CSD provide evidence of the district's adopted board policies for equitable hiring practices, samples of job postings over the last three years, employment application forms for licensed and unlicensed staff and the district's personnel hiring manual for equal employment opportunity.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- Seymour CSD did not provide evidence.

Recommendations:

- Seymour CSD should have policies and procedures in place to ensure equitable placement and advancement in employment within the district.

Required Corrective Action(s):

- Seymour CSD will provide evidence of the district's policies and procedures for equitable placement and advancement within the district for employees. Evidence will include personnel handbooks for both licensed and unlicensed staff and district salary schedules.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Seymour Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
<p>Annual Notice of Nondiscrimination.</p> <p>Seymour CSD will provide an annual notice which aligns with sample notices provided in the <u>Guidance for Nondiscrimination Notices: PK-12 Schools</u> document. The district must provide a copy of or hyperlink to an appropriate annual notice.</p>	Annual Notice of Nondiscrimination	Documentation of the district's Annual Notice of Nondiscrimination		11/15/24
<p>Continuous Notice of Nondiscrimination.</p> <p>The district will provide a continuous notice which aligns with sample notices provided in the <u>Guidance for Nondiscrimination Notices: PK-12 Schools</u> document. The district must provide a copy of or hyperlink to an</p>	Continuous Notice of Nondiscrimination	Documentation of the district's Continuous Notice of Nondiscrimination		11/15/24

appropriate continuous notice.				
<p>Designation of Equity Coordinator.</p> <p>Seymour CSD will provide evidence of the appointment of the designated equity coordinator, board agenda and minutes of the appointment, and a review of the activities conducted by the equity coordinator (reviewing data, training, reports and/or grievance process).</p>	Equity coordinator appointment in board agenda and minutes, documentation of roles and responsibilities	Board agenda, minutes and documentation of roles and responsibilities		11/15/24
<p>Grievance Procedures.</p> <p>Seymour CSD will provide adopted board policies for nondiscrimination and whom to contact to file a grievance.</p>	Board policies for grievance procedures	Board policy		11/15/24
<p>Grievance Procedures.</p> <p>Seymour CSD will provide adopted board policies for grievance procedures including the following elements: include all of the protected classes, and include the following elements:</p> <ul style="list-style-type: none"> • Voluntary informal mechanisms (e.g. mediation) for resolving some types of complaints if the 	Board policies for grievance procedures, forms and method for communicating findings	Board policies, forms and methods for communicating findings		11/15/24

<p>parties agree to do so are included, is it clear that step can be skipped especially in the case of sexual violence</p> <ul style="list-style-type: none"> • Notification to complainant of the right to end the informal process at any time • Application of the procedures to complaints alleging discrimination carried out by employees, other students, or third parties • Methods for notifying students, parents, and employees of the procedures, including where complaints may be filed • Adequate, reliable and impartial investigation of complaints, including the opportunity to present witnesses and present evidence • Designated and reasonably prompt time frames for the 				
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<p>major stages of the complaint process</p> <ul style="list-style-type: none"> • Methods for providing written notice to the parties of the complaint • An assurance the school will take steps to prevent the recurrence of any discrimination and to correct its discriminatory effects on the complainant and others, if appropriate. <p>If a district has more than one grievance procedure, it must be clear which one to use and when (i.e., Civil Rights Grievance, Anti-Bullying and Harassment Complaint).</p>				
<p>II. Recruitment, Admissions and Counseling</p>				
<p>Admissions Criteria.</p> <p>Seymour CSD will provide the course description guide including the implemented admission criteria that allows accessibility to all students and the process for removing prerequisite requirements to ensure all students have access.</p>	<p>Course description guide</p>	<p>Course description guide</p>		<p>11/15/24</p>

<p>Access for National Minority Students with Limited English Language Skills.</p> <p>Seymour CSD will submit documentation of the district's procedures for ensuring access for students with limited English language skills.</p>	<p>Course description guide</p>	<p>Course description guide</p>		<p>11/15/24</p>
<p>Counseling and Prospects for Success.</p> <p>Seymour CSD will submit the action steps and evidence counselors use to review documents and practices, align practices with guidance standards, a calendar of career planning activities, 8th grade career planning activities and documents and four-year planning documents.</p>	<p>Documentation of action steps and evidence counselors use to review documents, how the guidance standards are utilized, calendar of career planning activities, and planning documents</p>	<p>Documentation of action steps and evidence counselors use to review documents, how the guidance standards are utilized, calendar of career planning activities, and planning documents</p>		<p>11/15/24</p>
<p>Counseling of Students with Limited English-Speaking Ability or Hearing Impairments.</p> <p>Seymour CSD will provide the district's procedures for ensuring students with limited English-speaking skills and students who have hearing impairments have access to counseling services.</p>	<p>Procedures used to ensure access to services</p>	<p>Procedures used to ensure access</p>		<p>11/15/24</p>

<p>Recruitment and Promotional Activities.</p> <p>Seymour CSD will provide evidence of a meeting agenda and minutes ensuring an annual review of high school attendance center and course enrollment data disaggregated by subgroups and the steps the district will take to ensure disproportionate course enrollment data does not result from unlawful discrimination.</p>	<p>Meeting agenda and minutes of high school course enrollment data</p>	<p>Meeting agenda and minutes of high school course enrollment data</p>		<p>11/15/24</p>
<p>III. Accessibility for Students with Disabilities</p>				
<p>Written Plan.</p>	<p>For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>	<p>Provide a written copy or link to online publication.</p>		
<p>Parking.</p>	<p>All parking lots were gravel. Consequently, calculating the number of</p>	<p>Upload photo documentation to CASA.</p>		

	<p>spaces available and the corresponding number of ADA accessible and ADA van accessible spaces was not possible at this time.</p> <p>The parallel parking on the front of the building included two signs designated as ADA parking stalls. The signage for these two stalls needs to be at least 60 inches above the ground from the bottom of the sign.</p>			
Bus Loading Zone.	The bus loading zone needs to include ADA accessible signage.	Upload photo documentation to CASA.		
Accessible Routes.	Ramp and handrails	Upload photo documentation to CASA.		
Drinking Fountain.	2nd Floor – drinking fountain	Upload photo documentation to CASA.		
General Accessibility.	Need a written plan as auditorium was built prior to 1977.	Upload photo documentation to CASA.		
Protruding Objects.	AED and Stop the Bleed by the gym	Upload photo documentation to CASA.		
Toilet Room.	Daycare Room	Upload photo documentation to CASA.		
Toilet Room.	Faculty restroom Kitchen	Upload photo documentation to CASA.		

	<p>HS staff restroom</p> <p>Upper and lower boys and girls restrooms</p> <p>Football boys and girls restrooms</p> <p>Other restrooms as noted during the site visit</p>			
Operable Parts.	<p>Door knobs: Band room</p> <p>Choir room</p> <p>All other rooms with noncompliant knobs</p>	Upload photo documentation to CASA.		
Locker Room.	<p>JH and HS boys and girls locker rooms</p> <p>Coaches locker room</p>	Upload photo documentation to CASA.		
Signage.	Boys and girls cafeteria restrooms	Upload photo documentation to CASA.		
Signage.	HS girls and boys locker room	Upload photo documentation to CASA.		
Signage.	All exterior doors accessible route – entrance	Upload photo documentation to CASA.		
V. Services for Students with Disabilities				
Services for Students with Disabilities.	Board policies and procedures for Section 504, Section 504 Manual and forms	Board policies and procedures for Section 504, Section 504 Manual and forms		11/15/24

<p>Seymour CSD will provide evidence of the district's adopted board policies and procedures in place to identify and address the needs of a student with a disability, the forms utilized and where information can be located (ie Section 504 Procedures Manual, forms, handbooks etc).</p>				
<p>VI. Financial Assistance</p>				
<p>Financial Assistance. Seymour CSD will provide evidence of the procedures in place to provide notice of scholarships, honors or awards to its student body, procedures to ensure national origin minority persons with limited English language skills receive information in their own language and that foundation or scholarship committees working closely with the district include a nondiscrimination notice on materials.</p>	<p>Information of honors, awards and scholarships containing nondiscrimination notice</p>	<p>Information of honors, awards and scholarships containing nondiscrimination notice</p>		<p>11/15/24</p>
<p>VII. Work-Study, Cooperative Programs and Job Placement</p>				
<p>Work-Study, Cooperative Programs and Job Placement. Seymour CSD will provide a list of workplace-based</p>	<p>A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-</p>	<p>A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-</p>		<p>11/15/24</p>

education programs, the contracts utilized with all employers or other sponsors offering work-study cooperative education, job placement and apprenticeship programs; and the materials students complete to obtain these positions.	study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions	study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions		
VIII. Employment				
Employment. Seymour CSD will provide evidence of the district's adopted board policies for equitable hiring practices, samples of job postings over the last three years, employment application forms for licensed and unlicensed staff and the district's personnel hiring manual for equal employment opportunity.	Documentation of employment practices including screening/hiring policies and procedures	Documentation of employment practices including screening/hiring policies and procedures		11/15/24
Salary. Seymour CSD will provide evidence of the district's policies and procedures for equitable placement and advancement within the district for employees. Evidence will include personnel handbooks for both licensed and unlicensed	Salary policies, district salary schedule, personnel handbooks for licensed and unlicensed staff	Salary policies, district salary schedule, personnel handbooks for licensed and unlicensed staff		11/15/24

staff and district salary schedules.				
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Signature of Superintendent

Date

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Thu, Jun 13, 2024 at 10:43 AM

Subject: Re: Equity Desk Audit

To: Nickel, Sara <sara.nickel@iowa.gov>

Thanks, Sara!

On Thu, Jun 13, 2024 at 10:42 AM Nickel, Sara <sara.nickel@iowa.gov> wrote:

Hello Brad,

I know you are likely working on transitioning responsibilities to the next superintendent, but wanted to reach out to you to see if you need any support with completing the Equity Desk Audit. Documents can be submitted via the [23-24 Equity Desk Audit: Items for Electronic Submission](#) form. Each item has a description of what is required. Additional guidance can be located on the [Equity Education](#) web page. I have also included SueAnn Johnson, our Equity Compliance consultant in this email too in case you have any questions or run into any issues

Thanks and have a great day!

—
Sara Nickel
School Improvement Consultant
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
515-971-7558

sara.nickel@iowa.gov

educate.iowa.gov



Department of Education



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

August 16, 2024

Scott Valentine, Superintendent
Seymour Community School District
100 S Park Ave.
Seymour, IA 52590

Email: scott.valentine@seymourcsd.org

Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter – NON-RESPONSE

Dear Superintendent Valentine,

This letter is in reference to previous correspondence to the Seymour Community School District (CSD) from the Iowa Department of Education (Department), dated April 10, 2024 (MOA Selection Letter). As of the date of this letter, the Department has not received any response to our request for information as part of the equity desk audit. The Selection Letter states:

- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started you will not be able to stop and start later. If you have any questions, please contact Sara Nickel, School Improvement Consultant, Bureau of School Improvement at sara.nickel@iowa.gov.

On August 6, 2024, individuals from the Seymour CSD met with Department consultant, Mike Wright, for an ADA visit to review the district's buildings. This visit constitutes one part of the MOA review process. However, the desk audit part remains incomplete.

It is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please respond immediately to the equity desk audit, as the deadline has passed. Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,

Creating excellence in education through leadership and service

Tina Wahlert

Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: 515-326-0162
Email: Tina.Wahlert@iowa.gov

cc: SueAnn Johnson, Administrative Consultant, Equity Compliance, School Improvement
Eric Heitz, Iowa Department of Education Administrative Consultant, School
Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School
Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, School
Improvement Bureau

Tri-County Community School District



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Chad Straight, Superintendent
Tri-County Community School District
3003 Hwy 22
P.O. Box 17
Thornburg, IA 50255

Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Straight:

As a recipient of federal financial assistance, Tri-County Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and

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- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Tri-County CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Tri-County CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 55.56% for CTE Concentrators.
- **Indicator B:** Tri-County CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 15.74 % for CTE Concentrators.
- **Indicator C:** Tri-County CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 71.30% for CTE Concentrators.
- **Indicator D:** Tri-County CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 35.65% for CTE Concentrators.

District Responsibilities

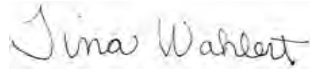
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Sara Nickel, Consultant, Bureau of School Improvement at sara.nickel@iowa.gov or (515) 971-7558.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement at sueann.johnson@iowa.gov or (515) 336-3942 or Sara Nickel, Consultant, Bureau of School Improvement at sara.nickel@iowa.gov or (515) 971-7558.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Sara Nickel, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter ↳ Inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>

to chad.straight, Kimberly, SueAnn, Eric, Scott, Michael, Sara ▾

Wed, Apr 10, 3:28 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



Department of Education

2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 30, 2024

Chad Straight, Superintendent
Tri-County Community School District
300 Highway 22
Thornburg, IA 50255Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Straight:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Tri-County Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Tri-County High School, Middle School, and Elementary School as all are included within the same building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Tri-County CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Tri-County CSD for an equity review are as follows:

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Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

Tri-County CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Tri-County CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Tri-County CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 55.56 percent for CTE Concentrators.
- Indicator B: Tri-County CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 15.74 percent for CTE Concentrators.
- Indicator C: Tri-County CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 71.30 percent for CTE Concentrators.
- Indicator D: Tri-County CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 35.65 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Tri-County CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong

recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Chad McKain, Tri-County CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Sara Nickel, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Mike Wright, Iowa Department of Education Education Program Consultant, Bureau of School Improvement

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Tri-County Community School District

Letter of Findings



September 30, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Tri-County CSD is published and contains career and technical education (CTE) programs and all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Tri-County CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Tri-County CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Tri-County CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Tri-County CSD School Board policy number 102 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Tri-County CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented recruitment and promotional activities.

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On July 30, 2024, DE consultant Mike Wright and Chad Straight and Josh Icenbice from the Tri-County CSD reviewed the Tri-County CSD in Thornburg, Iowa. This review included Tri-County High School, Middle School, and Elementary school as all are included within the same building.

The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Tri-County CSD, 3003 IA-22, Thornburg, IA 50255

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1965	Programs within facility must be readily accessible
Additions and renovations	Additions and renovations in 1990 and 1994	1991 ADA Standards

The items to be addressed on Tri-County campus are listed below.

- Parking: Appropriate number of accessible and van accessible parking stalls, with appropriate signage.
- Bus Loading Zone: Signage, as noted.
- Accessible Route: Greenhouse, stage access, sidewalk to ramp, and others, as noted.
- Protruding Object: AED in upper elementary hallway.
- Operable Parts: Door knobs, as noted.
- Toilet Rooms: Appropriate signage, grab bars, and plumbing coverage, as noted.
- Locker Room: Noncompliant for JH and HS Boys and Girls, as noted.
- Signage: Appropriate signage for shower accessibility, as noted.
- Signage: Appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed, as noted.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school	Section 504	Programs within facility must be readily accessible

	<p>district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>		
Parking	<p>The east parking lot is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time.</p> <p>The south parking area had 4 parking stalls on pavement and 2 stalls were designated as ADA accessible. One stall did not have an ADA accessible sign. In addition, there were multiple additional parking spaces that were gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time.</p> <p>The parking on the west side of the building is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time.</p> <p>The parking on the north side of the building is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time. There were 3 ADA accessible signs, but</p>	4.1.2	<p>If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.</p> <p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people can be seen from a driver's seat if the signs are mounted high enough above the ground and located at the front of a parking space.</p>

	without markings on the ground, a determination of the appropriate size of the ADA accessible stalls were not discernable.		
Bus Loading Zone	The bus loading zone needs to include ADA accessible signage.	4.1.2	International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.
Accessible Routes	<p>North entrance of building by ramp</p> <p>Vertical change at the bottom of the ramp</p> <p>North side of building to ramp handrails</p>	4.3.2	<p>At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public.</p> <p>Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.</p> <p>If a ramp run has a rise greater than 6 in (150 mm) or a horizontal projection greater than 72 in (1830 mm), then it shall have handrails on both sides.</p>
Accessible Routes	<p>Greenhouse door</p> <p>No route from the main building to the greenhouse</p>	<p>4.5.2</p> <p>4.5</p>	<p>Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.</p> <p>Ground and floor surfaces along accessible routes and in accessible rooms and spaces including floors, walks, ramps, stairs,</p>

			and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.
Accessible Route	Access to stage in the gym	4.3.2	<p>At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.</p> <p>At least one accessible route shall connect each story and mezzanine in multi-story buildings and facilities.</p>
Protruding Objects	AED in upper elementary hallway	307.2	Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.
Operable Parts	Door knobs Band room Choir room All other rooms with noncompliant knobs	3.13.9	Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is. easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. When sliding doors are fully open, operating hardware shall be exposed and usable from both sides. Hardware required for accessible door passage shall be mounted no higher than 48 in (1220 mm) above finished floor.
Toilet Room	Faculty restroom kitchen	4.1	Facilities and elements required to be identified as

			Signage that indicates accessible shower stall.
Signage	All exterior doors accessible route - entrance	4.1	Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility. Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance).

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Tri-County Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates school board policy 102 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district is working to ensure student workplace experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented strategies and school board policies 102 and 405.02, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Tri-County CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Tri-County Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
III. Accessibility for Students with Disabilities				
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.		
Parking. If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such	The east parking lot is gravel. The number of spaces and the corresponding number of ADA accessible spaces	Upload photo documentation to CASA.		

<p>parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.</p> <p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people can be seen from a driver's seat if the signs are mounted high enough above the ground and located at the front of a parking space.</p>	<p>were not determined at this time.</p> <p>The south parking area had 4 parking stalls on pavement and 2 stalls were designated as ADA accessible. One stall did not have an ADA accessible sign. In addition, there were multiple additional parking spaces that were gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time.</p> <p>The parking on the west side of the building is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time.</p> <p>The parking on the north side of the building is gravel. The number of spaces and the corresponding number of ADA accessible spaces were not determined at this time. There were 3 ADA accessible signs, but without markings on the</p>			
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	ground, a determination of the appropriate size of the ADA accessible stalls were not discernable.			
Bus Loading Zone: International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.	The bus loading zone needs to include ADA Accessible signage.	Upload photo documentation to CASA.		
<p>At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger loading zones, and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public.</p> <p>Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.</p> <p>If a ramp run has a rise greater than 6 in (150 mm) or a horizontal projection greater than 72 in (1830 mm), then it shall have handrails on both sides.</p> <p>Changes in level of ¼ inch (6.4 mm) high maximum shall be permitted to be vertical.</p> <p>Ground and floor surfaces</p>	<p>North entrance of building by ramp</p> <p>Vertical change at the bottom of the ramp</p> <p>North side of building to ramp handrails</p> <p>Greenhouse door</p> <p>No route from the main building to the Greenhouse</p> <p>Access to stage in the gym</p>	Upload photo documentation to CASA.		

<p>along accessible routes and in accessible rooms and spaces including floors, walks, ramps, stairs and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.</p> <p>At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.</p> <p>At least one accessible route shall connect each story and mezzanine in multi-story buildings and facilities.</p>				
<p>Protruding Objects: Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.</p>	<p>AED in upper elementary hallway</p>	<p>Upload photo documentation to CASA.</p>		
<p>Operable Parts: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. When sliding doors are fully open, operating hardware shall</p>	<p>Door knobs Band Room Choir Room</p> <p>All other rooms with noncompliant knobs</p>	<p>Upload photo documentation to CASA.</p>		

<p>be exposed and usable from both sides. Hardware required for accessible door passage shall be mounted no higher than 48 in (1220 mm) above finished floor.</p>				
<p>Toilet Room. Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Grab Bars. The diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.</p> <p>Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.</p>	<p>Faculty restroom kitchen</p> <p>HS staff restroom</p> <p>Upper and lower boys and girls restrooms</p> <p>Other restrooms as noted during the site visit</p>	<p>Upload photo documentation to CASA.</p>		
<p>Locker Room: Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> ● Turning Space ● Signage ● Toilets 	<p>JH and HS boys and girls locker rooms</p>	<p>Upload photo documentation to CASA.</p>		

<ul style="list-style-type: none"> • Showers • Exposed Pipes 				
<p>Signage. International Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1.</p> <p>Signage on exterior of the locker rooms needs ADA signage that indicates accessible shower stall.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance).</p>	<p>Door 300N</p> <p>Elementary locker rooms</p> <p>Exterior doors accessible route to entrance signage</p>	<p>Upload photo documentation to CASA.</p>		

Signature of Superintendent

Date

Turkey Valley Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Jay Jurrens, Superintendent
Turkey Valley Community School District
3219 Highway 24
Jackson Junction, IA 52171Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Jurrens:

As a recipient of federal financial assistance, Turkey Valley Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

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This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Turkey Valley CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Turkey Valley CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 27.78% for CTE Concentrators.
- **Indicator B:** Turkey Valley CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 26.39% for CTE Concentrators.
- **Indicator C:** Turkey Valley CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 54.17% for CTE Concentrators.
- **Indicator D:** Turkey Valley CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 27.08% for CTE Concentrators.

District Responsibilities

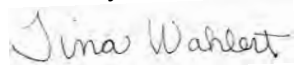
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Buffy Campbell, Consultant, Bureau of School Improvement, at buffy.campbell@iowa.gov or (515) 954-8651.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Buffy Campbell, Consultant, Bureau of School Improvement, at buffy.campbell@iowa.gov or (515) 954-8651.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Buffy Campbell, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>

to jjurrens, Kimberly, SueAnn, Eric, Scott, Michael, Buffy ▾

Wed, Apr 10, 3:25 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



Department of Education

2 Attachments • Scanned by Gmail



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 30, 2024

Mr. Jay Jurrens, Superintendent
Turkey Valley Community School District
3219 Hwy 24
Jackson Junction, IA 52171Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Jurrens:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Turkey Valley Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). This review included Turkey Valley High School, Middle School, and Elementary school, as all are included within the same building. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Turkey Valley CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Turkey Valley CSD for an equity review are as follows:

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Turkey Valley CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Turkey Valley CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Turkey Valley CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 27.78 percent for CTE Concentrators.
- Indicator B: Turkey Valley CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 26.39 percent for CTE Concentrators.
- Indicator C: Turkey Valley CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 54.17 percent for CTE Concentrators.
- Indicator D: Turkey Valley CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 27.08 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Turkey Valley CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the timeline for completion, up to one year from the date of the LOF. It is the Department's strong

recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant - Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Don Blazek Jr., Turkey Valley CSD School Board
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Turkey Valley Community School District

Letter of Findings



September 30, 2023

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- Turkey Valley CSD provided evidence of publication of the annual notices to stakeholders. However, the notice shared didn't include the annual equity notice including CTE areas offered by the district. District policy #102.E1 is correct, and includes the CTE programs offered by the district, as well as all required protected classes for both programs and employment.

Recommendations:

- As the district updates annual notice for publication, update the names/categories of the CTE strands. Verify that policy has been reviewed within the last five years. If out of date, add to the board agenda for review. See resource: [CTE Content Areas](#)

Required Corrective Action(s):

- Turkey Valley CSD will provide evidence that the district has published the annual notice including CTE areas offered by the district and submit for review.

Sample Wording:

The [Name of district] offers career and technical programs in the following service areas: [List CTE Service Areas]

It is the policy of the [Name of district] Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy please contact the district's Equity Coordinator, Name, Title, Address, Phone Number, E-mail Address.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Turkey Valley CSD is appropriately communicated and contains all required protected classes for both programs and employment, as well as the Equity Coordinator's contact information.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Turkey Valley CSD has appropriately designated an equity coordinator, as evidenced on the continual equity notice. However, the board minutes shared didn't include the approval of her appointment.

Recommendations:

- The district will provide board minutes which document the approval of the equity coordinator.
- The district should communicate the role and duties of the equity coordinator to staff, students, and community members.
- Additionally, the district should consider ways to provide training for the equity coordinator. Guidance for equity coordinator role, responsibilities and functions can be found on the Iowa Department of Education [Equity Compliance website](#).

Required Corrective Action(s):

- The district will provide board minutes which document the approval of the equity coordinator.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Turkey Valley CSD provided school board policy number 102 - Equal Educational Opportunity. However, there was no artifact provided that delineated the grievance procedures, or appropriately implemented and communicated the grievance procedures based on school board policy number.

Recommendations:

- Review of district policy manual, including required policy, regulations and forms.

Required Corrective Action(s):

- District will upload Policy 102.R1 and 102.E4 as evidence of grievance procedure and documentation forms. Check date of review to ensure that uploaded policy is current. District should include easily located links on the district website, or inclusion in the student/parent handbook.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Turkey Valley CSD School Board policy number 104 includes the protected classes.

Recommendations:

- Review of district policy manual, including required policy, regulations and forms related to bullying and harassment.

Required Corrective Action(s):

- District will upload Policy 104.E1, 104.E2, 104.E3, 104.R1, and 102.E4 as evidence of bullying and harassment policy and procedures for addressing potential concerns. Check date of review to ensure that uploaded policy is current. District should include easily located links to policy and reporting form on the district website, or inclusion in the student/parent handbook.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Turkey Valley CSD has appropriately implemented admission criteria that allows accessibility to all students. The handbook provided included courses with process prerequisite requirements that would potentially limit access to students.

Recommendations:

- Review course descriptions, editing those that include prerequisites tied to a specific grade or course. Consider using a phrase like “the student would be more/most successful if they have taken X (class) or have passed X class with a X (grade or percentage of accuracy).”

Required Corrective Action(s):

- Revise course descriptions removing grade or course-based prerequisites that potentially limit access to students enrolling. Provide revised version of updated course of study for review.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills. This includes access to EL support and a translator button on the district website.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- Turkey Valley CSD didn't provide documentation or artifacts that reflected procedures were in place (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Recommendations:

- Turkey Valley CSD reviews the current guidance program and ensures that guidance standards, curriculum, career planning activities, 8th grade career planning and four-year planning are included in the guidance program and are enacted.

Required Corrective Action(s):

- The district will provide documentation of guidance standards, curriculum and career planning activities. Evidence will include a standards document, enacted curriculum and career planning calendar that includes 8th grade career planning and the development of a four-year plan.

Resources to consider in developing documentation:

[Iowa Dept of Education School Counseling Resources](#)
[Iowa Dept of Education Career and Academic Planning](#)

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district has reviewed enrollment data to determine trends. This was limited to gender.

Recommendations:

- The District should include enrollment trends and analysis in their annual review of enrollment data that includes SES, Free and Reduced, minorities and students with disabilities as sub-groups.

Required Corrective Action(s):

- The district will provide documentation of equity and enrollment data review that includes all major sub-groups listed above.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On July 10, 2024, DE consultant Mike Wright, Michelle Hoy and Joe Pinter from the Turkey Valley CSD reviewed the Turkey Valley CSD in Jackson Junction, Iowa. This review included Turkey Valley High School, Middle School, and Elementary school as all are included within the same building. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Turkey Valley CSD, 3219 IA-24, Jackson Junction, IA 52171

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1960	Programs within facility must be readily accessible.
Additions and renovations	Additions and renovations in 2003	1991 ADA Standards

The items to be addressed on Turkey Valley campus are listed below.

- Parking: resurfacing and restriping as noted.
- Operable Parts: Door knobs as noted
- General Accessibility: Toilet Rooms need a written Plan as Restrooms were built prior to 1977 as noted
- Toilet Room: Signage, Grab Bars, and Exposed Pipes as noted.
- Locker Room: Noncompliant for Coaches Office and Varsity and JV Boys and Girls

- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Section 504	Programs within facility must be readily accessible
Parking	All parking areas currently have no parking stall markings. There are several ADA signs in different locations around the building. The district is working with FehrGraham Engineer to resurface all parking areas and repaint all parking stalls. This process is scheduled to be completed prior to the start of the 2024-25 school year.	4.1.2	If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.

			<p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated "van accessible" as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people can be seen from a driver's seat if the signs are mounted high enough above the ground and located at the front of a parking space.</p>
Operable Parts	Door knobs on storage paper room, custodian closets, entrance door 6, 7, 24 and all other rooms with noncompliant knobs	4.27.4	Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).
General Accessibility	Restrooms in rooms 600, 620, 640, and nurses' office.	206.2.3	Need a written plan as Auditorium was built prior to 1977.
Toilet Room	<p>Faculty restroom in main room 680, 520</p> <p>JH boys and girls restrooms staff copy room</p> <p>HS girls and boys restrooms</p> <p>Other restrooms as noted during the site visit</p>	<p>4.1</p> <p>4.16.4</p>	<p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Grab Bars. The diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while</p>

		4.19.4	<p>others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.</p> <p>Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.</p>
Locker Room	<p>Coaches locker room</p> <p>Varsity and JV boys and girls locker rooms</p>	4.35	<p>Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Turning Space • Door Swing • Signage • Toilets • Showers • Exposed Pipes
Signage	All exterior doors accessible route - entrance	4.1	<p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance);</p>

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Turkey Valley Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Required Corrective Action(s):

- None noted.

Recommendations:

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates school board policy 102.E3 is up to date. The district did not provide a copy of the 504 handbook or related forms for review.

Required Corrective Action(s):

- The district will develop a comprehensive 504 handbook for staff and parents that includes definitions, identification process, potential interventions and related forms to assure access for students who may qualify, and submit for review.

See Resources:

[Keystone AEA 504 Support Document](#)

Contact: Tasha Fritz

[Iowa Dept of Education Section 504](#)

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district has not appropriately implemented strategies for student financial assistance. There does not

appear to be any bias in the awarding of financial assistance. However, the district indicated that this was an area of need and is working towards ensuring that all documents are updated and in compliance.

Required Corrective Action(s):

- The district will review all Information on honors, awards, and scholarships and ensure they are available to all persons regardless of race, color, national origin, sex or disability. This information is not currently not included on scholarship information.
- The district will provide documentation that notices of scholarships, honors, or awards to the student body; that a procedure to ensure national origin minority persons with limited English language skills receive information in their own language and that Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district does not offer student workplace experiences at this time.

Recommendations:

- The district should consider options to expand career exploration opportunities for students through partnerships with local and near-by businesses, as well as possible access through agreements with neighboring districts.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD included documentation that indicates the school district has appropriately implemented strategies and school board policy 401.1, to ensure equity related to employment and personnel practices for certified staff. This included board policy and examples of the application for both

certified and classified staff. The district did not include samples of job postings or a hiring handbook that is aligned with Board Policy 401.1.

Required Corrective Action(s):

1. The district will provide the following documentation: 1) samples of job postings over the past three years for both certified and classified staff, and 2) hiring handbook aligned to board policy which includes screening/hiring policies and procedures.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Turkey Valley CSD indicates the school district does not have a certified staff handbook and salary documents.

Required Corrective Action(s):

- The district will provide documentation of implementation of appropriate hiring strategies to ensure equitable placement and advancement for certified and non-certified staff. Evidence should include a certified staff handbook and salary schedule with criteria for advancement.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP) Turkey Valley Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
<p>Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.</p> <p>Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV O and V.C.</p>	<p>Annual Notice of Nondiscrimination does not include Career and Technical Education (CTE) service areas offered by the district.</p> <p>Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.</p>	<p>The district will provide a link or copy of its Annual Notice of Nondiscrimination. Please ensure that the notice includes the CTE strands, all of the protected classes, and complete contact information of the equity coordinator.</p> <p>Update names of CTE strands as needed.</p>		10/30/24
II. Recruitment, Admissions and Counseling				
<p>Counseling and Prospects for Success Counselor practices</p> <p>OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36</p>	<p>District did not provide documentation of guidance programing, career planning or 4yr plan for HS students.</p>	<p>The district will provide action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents;</p>		10/30/24

		Four-Year planning documents		
III. Accessibility for Students with Disabilities				
Written Plan	<p>For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p> <p>Specifically, the district will address the following areas: Restrooms in rooms 600, 620, 640, and Nurses Office.</p>	Provide a written copy or link to online publication.		
Parking: If parking spaces are provided for self-parking by employees or visitors, or both, then accessible spaces complying with 4.6 shall be provided in each such parking area in conformance with the table below. Spaces required by the table need not be provided in the particular lot. They may be	<p>All parking areas currently have no parking stall markings. There are several ADA signs in different locations around the building.</p> <p>The district is working with FehrGraham Engineer to resurface all parking areas and repaint</p>	Upload photo documentation to CASA.		

<p>provided in a different location if equivalent or greater accessibility, in terms of distance from an accessible entrance, cost and convenience is ensured.</p> <p>One in every eight accessible spaces, but not less than one, shall be served by an access aisle 96 in (2440 mm) wide minimum and shall be designated “van accessible” as required by 4.6.4.</p> <p>Facilities and elements required to be identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Signs designating parking places for disabled people can be seen from a driver’s seat if the signs are mounted high enough above the ground and located at the front of a parking space.</p>	<p>all parking stalls. This process is scheduled to be completed prior to the start of the 2024-25 school year.</p>			
<p>Operable Parts: Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbf (22.2 N).</p>	<p>Door knobs on Storage Paper Room, Custodian closets, Entrance door 6, 7, 24 and all other rooms with noncompliant knobs.</p>	<p>Upload photo documentation to CASA.</p>		
<p>Toilet Room. Facilities and elements required to be identified as accessible by 4.1</p>	<p>Faculty Restroom in main room 680, 520</p>	<p>Upload photo documentation to CASA.</p>		

<p>shall use the international symbol of accessibility.</p> <p>Grab Bars. The diagonal and side approaches most commonly used to transfer from a wheelchair to a water closet. Some wheelchair users can transfer from the front of the toilet while others use a 90-degree approach. Most people who use the two additional approaches can also use either the diagonal approach or the side approach.</p> <p>Exposed Pipes and Surfaces. Hot water and drain pipes under lavatories shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories.</p>	<p>JH boys and girls restrooms</p> <p>Staff copy room</p> <p>HS girls and boys restrooms</p> <p>Other restrooms as noted during the site visit</p>			
<p>Locker Room: Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> Turning Space Door Swing Signage Toilets Showers Exposed Pipes 	<p>Coaches locker room</p> <p>Varsity and JV boys and girls locker rooms</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage. Facilities and elements required to be</p>	<p>Exterior doors accessible route – entrance</p>	<p>Upload photo documentation to CASA.</p>		

<p>identified as accessible by 4.1 shall use the international symbol of accessibility.</p> <p>Accessible entrances when not all are accessible (inaccessible entrances shall have directional signage to indicate the route to the nearest accessible entrance);</p>				
<p>IV. Services for Students with Disabilities</p>				
<p>Section 504 Policies and Procedures and/or Manual.</p> <p>OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130</p>	<p>District did not provide 504 manual or other documents related to the identification and support for students who potentially qualify.</p>	<p>The district will provide Board Policy (IASB Sample Policy 102 series); and/or a copy of the Section 504 Procedures Manual and/or forms; and Staff Handbook. Update Staff handbooks to include cross reference to 504 guidance and handbook.</p>		<p>10/30/24</p>
<p>VI. Financial Assistance</p>				
<p>Financial Information – Scholarships</p> <p>OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37</p>	<p>Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability. Currently not included on scholarship information.</p>	<p>The district will review all Information on honors, awards, and scholarships and ensure they are available to all persons regardless of race, color, national origin, sex or disability. This information is not currently not included on scholarship information.</p>		

		The district will provide a notice of scholarships, honors, or awards to the student body; a procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.		
VIII. Employment				
Documentation of employment practices including screening/hiring policies and procedures. OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	District did not include examples of job postings (last three years) or hiring handbook aligned to board policy.	The district will provide the following documentation: 1) samples of job postings over the past three years, and 2) hiring handbook aligned to board policy.		10/30/24

Signature of Superintendent

Date

Woodbury Central Community School District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 10, 2024

Doug Glackin, Superintendent
Woodbury Central Community School District
408 S 4th St,
Menville, IA 51039Re: Iowa Department of Education Methods of Administration (MOA) – Selection Letter

Dear Superintendent Glackin:

As a recipient of federal financial assistance, Woodbury Central Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex, and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. The Methods of Administration (MOA) program is overseen by the U.S. Department of Education Office of Civil Rights (OCR), in partnership with the Office of Career, Technical, and Adult Education (OCTAE) and administered by each state agency in order to ensure that all students have equal access to high-quality CTE programs.

As part of Iowa's commitment to ensure equity in education, your district has been selected for an equity compliance review of your CTE programs. This will include a desk audit of your district's policies and procedures and an on-site visit to determine accessibility under the Americans with Disabilities Act (ADA). By conducting this review, the Iowa Department of Education (Department) will determine your district's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990, and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

This letter provides important information needed to prepare for the equity compliance review.

Selection Criteria Used to Identify School Districts for an Equity Compliance Review

The OCR requires state education agencies to develop their own methods of administration and related procedures to ensure school districts' compliance with applicable federal and state civil rights laws. Since 2020, the Department has implemented a MOA Plan that aims to ensure compliance across the state and address inequity by working with districts to remedy areas of noncompliance. On an annual basis, all districts providing CTE programs will be considered for selection for an equity review if six or more years have passed since their last equity review. Newly reorganized districts are considered as never having received a focused equity review.

The following criteria is currently used to determine which districts will receive equity reviews:

- Proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance
- Proficiency percentages in Mathematics from Perkins V core indicators of performance

Selection Criteria Results

For school year 2023-24, the 10 districts with the lowest performance in reading/language arts and mathematics were selected to receive an equity review. Below is a summary of Woodbury Central CSD's data for students who were calculated to be CTE Concentrators in the 2022-23 reporting year. A CTE concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/CIP.

- **Indicator A:** Woodbury Central CSD's proficiency percentages in Reading/Language Arts from Perkins V core indicators of performance averaged to 36.51% for CTE Concentrators.
- **Indicator B:** Woodbury Central CSD's proficiency percentages in Mathematics from Perkins V core indicators of performance averaged to 0.00% for CTE Concentrators.
- **Indicator C:** Woodbury Central CSD's Reading/Language Arts proficiency percentage added to their Mathematics proficiency percentage from the Perkins V core indicators of performance was 36.51% for CTE Concentrators.
- **Indicator D:** Woodbury Central CSD's average percent of proficiency in Reading/Language Arts and Mathematics from Perkins V core indicators of performance was 18.25% for CTE Concentrators.

District Responsibilities

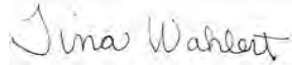
- **Desk Audit:** Please see the desk audit items attached to this letter. Desk audit documents should be placed in this [form](#) no later than May 31, 2024. Documents must be collected and ready to place in the form prior to starting. Once the form is started, you will not be able to stop and start later. If you have any questions, please contact Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.

- **ADA Accessibility On-Site Visit:** Additional details on the ADA visit will be sent to you by Scott Dryer, Consultant, Bureau of Learner Strategies and Supports, at scott.dryer@iowa.gov or (515) 402-8700 and/or Michael Wright, Consultant, Bureau of School Improvement, at mike.wright@iowa.gov or (515) 494-5610.

Following the ADA visit, your district will receive a Letter of Finding (LOF) from the Department that will contain findings concerning your district's compliance with applicable civil rights laws, recommendations for improvement, and any areas of non-compliance, if applicable. If areas of noncompliance are identified, the district must respond by completing the Voluntary Compliance Plan (VCP) provided by the Department. The Department will arrange a meeting with district administrators to review the VCP and determine appropriate deadlines for addressing noncompliance items. The Department may provide any requested and/or necessary technical assistance to ensure the district's compliance with applicable civil rights laws. The Department will monitor until all areas of noncompliance are corrected. As part of the MOA process, the Department is required to submit all LOFs and VCPs to the OCR on a biennial basis. The next Biennial Report is due at the end of 2024.

Thank you in advance for your cooperation throughout this review process. Your time and effort are greatly appreciated. If you have any questions, please contact SueAnn Johnson, Administrative Consultant, Bureau of School Improvement, at sueann.johnson@iowa.gov or (515) 336-3942 or Pam Spangler, Consultant, Bureau of School Improvement, at pam.spangler@iowa.gov or (515) 229-6425.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

CC: Kimberly Buryanek, Administrator, Division of PK-12 Learning
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Scott Dryer, Consultant, Bureau of Learner Strategies and Supports
Michael Wright, Consultant, Bureau of School Improvement
Pam Spangler, Consultant, Bureau of School Improvement

2023-2024 Methods of Administration (MOA) – Equity Desk Audit

Purpose: Public School Districts, working toward continuous improvement of instruction and student learning in career and technical education programs, assure ongoing compliance with state and federal legal requirements as part of the Methods of Administration (MOA) program.

Deadline: Friday, May 31, 2024

Submission: Equity Desk Audit information will be submitted through a Google form.

Equity Desk Audit Requirements:

Item	Evidence	Law and/or Rule	Evidence Guidance
1. Administrative Requirements	a. Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.	a. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C.	a. Sample Annual Notice on website.
	b. Continuous Notice of Nondiscrimination	b. Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV-O and V.C	b. Sample Continuous Notice (Page 4) in Handbooks
	c. Appointment of Equity Coordinator and summary of coordinator activities	c. OCR Guidelines Sections IV.O; 34 C.F.R. 104.7(a) and 106.8(a); 28 C.F.R. 35.107(a)	c. Committee meeting, board agendas and minutes documenting appointment of coordinator and review of coordinator activities (reviewing data, training, reports and/or grievance process).
	d. Grievance Procedures Civil Rights Grievance Policy and Procedures	d. 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)	d. Board Policy, IASB Sample Policy 102

Item	Evidence	Law and/or Rule	Evidence Guidance
	e. Grievance Procedures Policy prohibiting harassment and bullying of or by students, staff, and volunteers	e. 281—IAC 12.3(13), Title IX Section 106.31, Iowa Code 280.28(3) and 729A.1	e. Board Policy including protected classes, Sample IASB 104
2. Recruitment, Admissions and Counseling	a. Admission Criteria in the High School Student Handbook	a. OCR Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21	a. Course Description Guide. Guide should contain the following information: graduation requirements, explanation of the grading system, description of each CTE program, the number of credits available, and any prerequisites. All students must be eligible to take CTE courses, (although some courses may state a specific grade level requirement) and may not use criteria based on race, color, national origin, sex or disability.
	b. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide.	b. OCR Guidelines Section IV.L	b. Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.
	c. Counseling and Prospects for Success Counselor practices	c. OCR Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36	c. Action steps of counselors to review documents and practices; Guidance standards; Guidance curriculum; Calendar of career planning activities; 8th grade career planning activities and documents; Four-Year planning documents
	d. Counseling of Students with Limited English Speaking Ability or Hearing Impairments Materials or services available to students. May add additional translated documents	d. OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)	d. Procedures to ensure students of limited English Speaking Ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.
	e. Recruitment and Promotional Activities Attendance center and	e. 281—IAC 12.1(1) OCR Guidelines Section V.A, V.C	e. A description (meeting agenda) of how high school course enrollment is used, with what frequency, by whom, and for what purposes. A summary of attendance

Item	Evidence	Law and/or Rule	Evidence Guidance
	course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually	and V. E; 34 C.F.R. § 106.23	center, program, and course enrollment-related trends noted over the past three years (data from EdInsight or student management system can be used to develop/study trends). A summary of steps taken to increase participation in programs where disproportion was found
3. Services for Students with Disabilities	Section 504 Policies and Procedures and/or Manual	OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Board Policy (IASB Sample Policy #102 series); Section 504 Procedures Manual and/or forms; Staff handbook
4. Financial Assistance	Information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.	OCR Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37	Procedure to provide notice of scholarships, honors, or awards to student body; Procedure to ensure national origin minority persons with limited English language skills receive information in their own language; Foundation or scholarship committees working closely with the district include nondiscrimination notice on materials.
5. Work Study, Cooperative Programs, and Job Placement	A list of workplace-based education programs; the contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs; and the application materials that students complete to obtain these positions.	OCR Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)	A district not only has the responsibility to provide its services in a nondiscriminatory manner, but it also has the responsibility to help ensure that unions and private businesses with which they place students do not discriminate. Workplace based contracts and application materials must contain the district's nondiscrimination notification, along with a statement that employers or other sponsors are prohibited from engaging in unlawful discrimination.
6. Employment	a.Documentation of employment practices including screening/hiring policies and procedures.	a.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	a.Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff; Personnel Hiring Manual; Policy for equal employment opportunity (IASB Sample Policy 401.)

Item	Evidence	Law and/or Rule	Evidence Guidance
	b.Salary policies related to placement and advancement	b.OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	b.District salary schedule(s); Personnel handbooks for both licensed and unlicensed staff

*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. All school board policies must be reviewed every five (5) years. 281-IAC 12.3(2).

MOA Selection Letter ↳ Inbox x



Foust, Zacchary <zacchary.foust@iowa.gov>
to dglackin, Kimberly, SueAnn, Eric, Scott, Michael, Pam ▾

Wed, Apr 10, 3:32 PM

This email is being sent on behalf of Tina Wahlert, Chief, Bureau of School Improvement.

Tina Wahlert
Chief, Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, IA 50319-0146
Ph: 515-326-0162
tina.wahlert@iowa.gov
www.educateiowa.gov



2 Attachments • Scanned by Gmail ⓘ



McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 4, 2024

Tom Luxford, Superintendent
Woodbury Central Community School District
408 S. 4th Street
Menville, IA 51039Re: Iowa Department of Education Methods of Administration Equity Review – Letter of Findings

Dear Superintendent Luxford:

The Iowa Department of Education (Department) would like to express appreciation for the documents you submitted as part of the Methods of Administration (MOA) equity review. As a recipient of federal financial assistance, Woodbury Central Community School District (CSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 CFR Part 100, Appendix B) (*Guidelines*) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs, and that receive federal financial assistance from the U.S. Department of Education (Federal Department). Because Woodbury Central High School, Middle School, and Elementary school are all included within the same building, all were included in the Department's review. The purpose of the review was to determine the school's compliance with the *Guidelines*, and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964, and its implementing regulations in 34 CFR Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972, and its implementing regulations in 34 CFR Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973, and its implementing regulations in 34 CFR Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 (ADA), and its implementing regulations in 28 CFR Part 35, which prohibit discrimination on the basis of disability.

Woodbury Central CSD was selected for review based on the Department's targeting plan, which requires review of the subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the basis of race, sex and disability. The specific factors that led to the selection of Woodbury Central CSD for an equity review are as follows:

Creating excellence in education through leadership and service

Woodbury Central CSD Data:

The 10 school districts with the lowest performance were selected to receive a focused equity review in 2022-2023. Below is a summary of Woodbury Central CSD's data for students who were calculated to be CTE Concentrators in the 2021-2022 reporting year. A CTE Concentrator is a student who has completed 2.0 sequential units of coursework in a CTE program/pathway/classification of instructional programs.

- Indicator A: Woodbury Central CSD's proficiency percentages in reading/language arts from Perkins V core indicators of performance averaged to 36.51 percent for CTE Concentrators.
- Indicator B: Woodbury Central CSD's proficiency percentages in mathematics from Perkins V core indicators of performance averaged to 0.00 percent for CTE Concentrators.
- Indicator C: Woodbury Central CSD's reading/language arts proficiency percentage, added to their mathematics proficiency percentage from the Perkins V core indicators of performance, was 36.51 percent for CTE Concentrators.
- Indicator D: Woodbury Central CSD's average percent of proficiency in reading/language arts and mathematics from Perkins V core indicators of performance was 18.25 percent for CTE Concentrators.

Letter of Findings:

This letter of findings (LOF) summarizes the Department's findings in the following eight major areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions and Counseling
- III. Accessibility
- IV. Comparable Facilities
- V. Services for Students with Disabilities
- VI. Financial Assistance
- VII. Work-study, Cooperative Programs and Job Placements
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the equity review. The LOF includes findings, recommendations, and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience, and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue.

All required corrective actions must be included in Woodbury Central CSD's Voluntary Compliance Plan (VCP). A VCP template is attached with the areas of noncompliance already entered (see Attachment A), though you may use a different format if you choose. At a minimum, your VCP should address every item of noncompliance; describe the corrective action your school district will take to remedy each item; the target completion date (month and year); and a statement of how completion of the corrective action will be reported to, and verified with, the Department. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. For noncompliance items in the area of Accessibility, you must indicate the

timeline for completion, up to one year from the date of the LOF. It is the Department's strong recommendation that you choose a timeline that allows for ordering and purchasing any new materials, such as accessible signage and accessible door handles. For noncompliance items in other areas, the equity review team will set a date for completion. The Federal Department's Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt, but reasonable, according to their level of difficulty. If a remedy will take longer than one calendar year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending. The VCP must be signed and dated by the superintendent. Once completed, please submit the VCP to SueAnn Johnson, Administrative Consultant, Equity Compliance, and/or your school improvement consultant within 45 calendar days of the date of the LOF.

Please be advised that your school district has a continuing obligation to maintain compliance with all civil rights requirements. Continued technical assistance for any issue or concern that may arise within your school district, or any assistance needed for preparing your VCP, is available through the Department.

Thank you again for your cooperation throughout this equity review process and for your continued interest in ensuring that our educational programs effectively serve all our students. Your time and effort in organizing documents for review and scheduling interviews is much appreciated. If you desire clarification of the contents of this letter, please contact Tina Wahlert, Chief, Bureau of School Improvement at 515-326-0162 or SueAnn Johnson, Administrative Consultant, Equity Compliance, Bureau of School Improvement at 515-336-3942.

Sincerely,



Tina Wahlert, Chief
Bureau of School Improvement

cc: Eric Nelson, Woodbury Central CSD Board President
SueAnn Johnson, Iowa Department of Education Administrative Consultant, Equity Compliance, School Improvement Bureau
Eric Heitz, Iowa Department of Education Administrative Consultant, School Improvement Bureau
Pam Spangler, Iowa Department of Education School Improvement Consultant, School Improvement Bureau
Scott Dreyer, Iowa Department of Education Education Program Consultant, School Finance, Bureau of School Business Operations

Attachment A: Areas of Equity Noncompliance - Voluntary Compliance Plan

Woodbury Central Community School District

Letter of Findings



September 4, 2024

**Iowa Department of Education
Grimes State Office Building
400 East 14th Street
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the nondiscrimination notices, the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 Code of Federal Regulations (CFR) Part 100, Appendix B) (*Guidelines*) section IV.O; 34 CFR section 100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Woodbury Central CSD is published and all required protected classes for both programs and employment are listed. The career and technical education (CTE) programs were not listed in School Board Policy 102.E1

Required Corrective Action(s):

- Woodbury Central CSD will include the CTE programs offered by the district in the Annual Notice of Nondiscrimination School Board Policy 102.E1.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 CFR sections 100.6(d), 104.8, and 106.9; and 28 CFR. section 35.106

Summary of Findings and Analysis:

- The continuous notice of nondiscrimination provided by Woodbury Central CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Recommendations:

- On page 2 of the newsletter, the Equal Education Opportunity notice should be changed to the Annual Notice of Nondiscrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* section IV.O; 34 CFR sections 104.7(a) and 106.8(a); 28 CFR section 35.107(a)

Summary of Findings and Analysis:

- Woodbury Central CSD has appropriately designated an equity coordinator and has communicated the role and duties to staff, students, and community members.

Recommendations:

- The superintendent, along with Kelsey Schram, serves as the district equity coordinator. The district may want to consider assigning this duty to another staff member; in the event of a complaint against the superintendent, the district would not have an individual who directly supervises the superintendent who could investigate a complaint. Additionally, the district should consider ways to provide training for the equity coordinator. Guidance for the equity coordinator role can be found on the Iowa Department of Education equity compliance webpage at: <https://educate.iowa.gov/pk-12/accreditation-program-approval/equity-compliance#equity-coordinator-role-and-responsibilities>

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 CFR sections 104.7(b) and 106.8(b); 28 CFR section 35.107(b)

Summary of Findings and Analysis:

- Woodbury Central CSD has appropriately implemented and communicated the grievance procedures in school board policy number 102.R1.

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX section 106.31, sections 280.28(3) and 729A.1, Iowa Administrative Code 281—12.3(13)

Summary of Findings and Analysis:

- Woodbury Central CSD School Board policy number 1.2.R1 includes the protected classes.

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions and Counseling

This section includes equity issues related to recruitment, admissions, and counseling related to enrollment trends in CTE programs, courses, and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* sections IV.A, IV.F, IV.K, and IV.N; 34 CFR sections 100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Woodbury Central CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* section IV.L

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district has appropriately implemented procedures to ensure access for students with limited English language skills.

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* sections V.A and B; 34 CFR sections 100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, eighth grade career planning and four-year planning) to ensure student success.

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* section V.D; 34 CFR 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD does not indicate the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments. The LAU Plan does not identify how the school district has appropriately implemented counseling services for students with limited English-speaking ability or hearing impairments.

Required Corrective Action(s):

- The district will provide a written explanation of how counseling services are implemented for students with limited English-speaking ability or hearing impairments.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* section V.A, V.C and V. E; 34 CFR section 106.23

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD does not indicate the school district has appropriately implemented recruitment and promotional activities. There was no summary of attendance center, program, and course enrollment-related trends noted over the past three years. Additionally, there was no meeting agenda of how high school course enrollment is used, with what frequency, by whom, and for what purposes. This would also include a summary of steps taken to increase participation in programs where disproportion was found.

Recommendations:

- It is recommended that a group of CTE teachers, HS principal, and superintendent meet annually to review attendance center, program and course-enrollment-related trends within CTE classes. This would also include a summary of steps to increase participation in programs where disproportionality was found.

Required Corrective Action(s):

- Provide an explanation of how the CTE teachers recruit or promote their service areas to increase student interest in enrolling in a CTE class.
- Provide a description of how high school course enrollment is used, with what frequency, by whom, and for what purposes.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* section IV.N; 34 CFR sections 104.21-104.23; 28 C.F.R. sections 35.149-35.151

Summary of Findings and Analysis:

On June 4, 2024, DE consultants, Faith Lambert, and Dr. Doug Glackin reviewed the Woodbury Central CSD in Merville, Iowa. This review included Woodbury Central High School, Middle School, and Elementary school as all are included within the same building. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries.

Woodbury Central CSD, 408 W. 4th Street, Merville, IA 51039

Building / Additions	Construction Year	Applicable Review Standard
Original construction	1923	Programs within facility must be readily accessible.

Addition(s)	Additions and Renovations in 1955, 1990, 1995, 2022	2010 ADA Standards
-------------	---	--------------------

The items to be addressed on Woodbury Central campus are listed below.

- Parking: appropriate number of ADA accessible and van accessible parking stalls, with appropriate signage.
- Interior Accessible Route: AED Protrusion in Cafeteria
- Drinking Fountain: 2nd Floor as noted
- Operable Parts: Door knobs as noted
- Toilet Rooms: appropriate signage, grab bars, and plumbing coverage as noted
- Toilet Room: Agriculture Building
- Locker Room: Noncompliant for JH Boys and Girls
- Signage: Appropriate signage for shower accessibility as noted
- Signage: appropriate ADA accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.

Recommendations:

The school district and/or its maintenance personnel may want to refer to the ADA checklist (with diagrams) at: <https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf>.

Required Corrective Action(s):

Area of non-compliance	Compliance issue	ADA Standard	ADA Standard Description
Parking	<p>The teacher parking lot has 34 stalls with 2 ADA accessible. The parking lot will need to designate one of the 2 stalls as an ADA van accessible and the appropriate signage installed.</p> <p>The elementary parking lot has 25 stalls with 2 ADA assessable. The parking lot will need to designate 1 stall as being ADA Van assessable, and the appropriate signage installed.</p>	208.2.4	Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.
Protruding Objects	AED in the Cafeteria	307.2	Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm)

			maximum horizontally into the circulation path.
Drinking Fountain	2 nd Floor	211.2 602.4	Minimum Number. No fewer than two drinking fountains shall be provided. One drinking fountain shall comply with 602.1 through 602.6 and one drinking fountain shall comply with 602.7. Spout Height. Spout outlets shall be 36 inches (915 mm) maximum above the finish floor or ground.
Operable Parts	Door knobs Band Room Choir Room All other rooms with noncompliant knobs	309.4	Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.
Toilet Room	Faculty Restroom in Main Office Kitchen Commons Restroom Womens Restroom by Science Classroom Mens Restroom in the Old Lobby Other Restrooms as noted during the site visit	703.7.2.1 609	Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm)

		606.5	<p>minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p> <p>Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>
Toilet Room	Agriculture Building	603	<p>Not ADA compliant at this time. See ADA Standards section 603 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Clearance/Size • Grab Bars • Dispensers • Approach/Toe Clearance • Exposed Pipes
Locker Room	JH Boys and Girls Locker Room	803	<p>Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Turning Space • Door Swing • Benches • Toilets • Showers • Exposed Pipes
Signage	Boys and Girls Locker Room	216.6	Signage on exterior of the locker rooms needs ADA

			Signage that indicates accessible shower stall.
Signage	Agriculture Building All Exterior Doors Accessible Route - Entrance	216	Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* section VI.D; 34 CFR section 106.33

Summary of Findings and Analysis:

- Woodbury Central Community School District has separate shower and toilet rooms for male and female students. These facilities were reviewed and the shower and toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §106.33.

Recommendations:

- None noted.

Required Corrective Action(s):

- None noted.

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* sections IV.N and VI.A; 34 CFR sections 104.4(a) and 104.33-104.36; 28 CFR section 35.130

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates school board policy 102 and Section 504 forms are up to date and available to ensure services for students

with disabilities are receiving an equitable education. The district does not have a Section 504 Procedure Manual to assist staff and families in the process and eligibility of students in receiving a 504.

Required Corrective Action(s):

- Create a District and Parent Handbook for Section 504. We encourage you to review other district handbooks and/or the sample handbooks found at this link on the Iowa Department of Education website, for ideas and suggestions:
<https://educate.iowa.gov/pk-12/student-services/specialized-support/504>

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* sections VI.B; 34 CFR sections 100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement and apprenticeship programs; and of the application materials students complete to obtain these positions.

A. Work-Study, Cooperative Programs and Job Placement

Applicable Requirements: *Guidelines* sections VII.A and B, 34 CFR section 106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district is working to ensure student work place experiences are free of discrimination.

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district has appropriately implemented strategies and school board policy 405.2, to ensure equity related to employment and personnel practices.

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* sections VIII.A-F; 34 CFR sections 104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Woodbury Central CSD indicates the school district has appropriately implemented strategies to ensure equitable placement and advancement.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Attachment A

Areas of Equity Noncompliance – Voluntary Compliance Plan (VCP)

Woodbury Central Community School District

Required Corrective Action	Specific Remedies to Correct	Evidence Needed to Verify Remedy	Responsible Staff Member(s) Name, Title	Timeline for Completion M/D/Y
I. Administrative Requirements				
<p>Annual Notice of Nondiscrimination including Career and Technical Education (CTE) service areas offered by the district.</p> <p>Section 504 34 CFR 104.8, Title IX 34 CFR 106.9, OCR Guidelines IV O and V.C.</p>	<p>The Career and Technical Education (CTE) service areas must be listed in School Board Policy 102.E1.</p>	<p>An updated version of School Board Policy 102.E1 will be uploaded.</p>		<p>10/18/24</p>
II. Recruitment, Admissions and Counseling				
<p>Counseling of Students with Limited English-Speaking Ability or Hearing Impairments Materials or services available to students.</p> <p>OCR Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)</p>	<p>Procedures to ensure students of limited English-speaking ability benefit from counseling services; Procedures to ensure students with hearing impairments benefit from counseling services.</p>	<p>A written explanation of how counseling services are implemented for students with limited English-speaking ability or hearing impairments.</p>		<p>10/18/24</p>

III. Accessibility for Students with Disabilities				
Written Plan.	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Provide a written copy or link to online publication.		
Parking. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.	The teacher parking lot has 34 stalls with 2 ADA accessible. The parking lot will need to designate one of the 2 stalls as an ADA van accessible and the appropriate signage installed. The elementary parking lot has 25 stalls with 2 ADA assessable. The parking lot will need to designate 1 stall as being ADA Van assessable, and the appropriate signage installed.	Upload photo documentation to CASA.		
Protruding Objects. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030	AED in the Cafeteria	Upload photo documentation to CASA.		

<p>mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.</p>				
<p>Drinking Fountain. Minimum Number. No fewer than two drinking fountains shall be provided. One drinking fountain shall comply with 602.1 through 602.6 and one drinking fountain shall comply with 602.7.</p> <p>Spout Height. Spout outlets shall be 36 inches (915 mm) maximum above the finish floor or ground.</p>	<p>2nd Floor</p>	<p>Upload photo documentation to CASA.</p>		
<p>Operable Parts. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum</p>	<p>Door knobs Band Room Choir Room All other rooms with noncompliant knobs</p>	<p>Upload photo documentation to CASA.</p>		
<p>Toilet Room. Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.</p> <p>Grab bars shall be installed in a horizontal position, 33 inches</p>	<p>Faculty Restroom in Main Office Kitchen Commons Restroom Women’s Restroom by Science Classroom Men’s Restroom in the Old Lobby Other Restrooms as noted during the site visit</p>	<p>Upload photo documentation to CASA.</p>		

<p>(840 mm) minimum and 36 inches (915 mm) maximum above the finish floor measured to the top of the gripping surface, except that at water closets for children's use complying with 604.9, grab bars shall be installed in a horizontal position 18 inches (455 mm) minimum and 27 inches (685 mm) maximum above the finish floor measured to the top of the gripping surface. The height of the lower grab bar on the back wall of a bathtub shall comply with 607.4.1.1 or 607.4.2.1.</p> <p>Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.</p>				
<p>Toilet Room. Not ADA compliant at this time. See ADA Standards section 603 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> ● Clearance/Size ● Grab Bars ● Dispensers ● Approach/Toe Clearance Exposed Pipes 	<p>Agriculture Building</p>	<p>Upload photo documentation to CASA.</p>		

<p>Locker Room. Not ADA compliant at this time. See ADA Standards section 803 for requirements.</p> <p>Items include but not limited to:</p> <ul style="list-style-type: none"> • Turning Space • Door Swing • Benches • Toilets • Showers • Exposed Pipes 	<p>JH Boys and Girls Locker Room</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Locker Room. Signage on exterior of the locker rooms needs ADA Signage that indicates accessible shower stall.</p>	<p>Varsity Boys and Girls Locker Rooms</p>	<p>Upload photo documentation to CASA.</p>		
<p>Signage for Entrance Location. Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.</p>	<p>Agriculture Building</p> <p>Exterior Doors Accessible Route to Entrance signage. A</p>	<p>Upload photo documentation to CASA.</p>		

Signature of Superintendent

Date

2023-2024 Community Colleges

Iowa Valley Community College District

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

April 12, 2024

Dr. Anne Howsare Boyens, President
Iowa Valley Community College District
3702 S. Center Street
Marshalltown, IA 50158

RE: Iowa Department of Education Equity Review – October 18-19, 2023
Re: Letter of Findings and Voluntary Compliance Plan

Dear President Boyens,

The Iowa Department of Education (the Department) would like to express appreciation for the courtesies extended to the visiting team of Kelly Friesleben, Amy Gieseke, Heather Meissen, Joe Collins, Lora Vargason and SueAnn Johnson during the educational equity review conducted at Iowa Valley Community College (IVCCD) on October 18-19, 2023, including a facilities review conducted by Scott Dryer and Bill Roederer. We enjoyed our visit and learned a great deal about your college, staff, programs and processes that we have shared in the attached Letter of Findings (LOF).

As a recipient of federal financial assistance from the U.S. Department of Education, IVCCD is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer such programs.

In the fulfillment of this requirement, the Department conducts equity reviews to determine college's compliance with the *Guidelines* and, in particular, the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations, 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations, 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations, 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations, 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Creating excellence in education through leadership and service

IVCCD was selected for review based on the Department's targeting plan, in which we assess the three community colleges scheduled to undergo accreditation visits in any given year. The targeting plan includes items such as: enrollment patterns in CTE programs based on disability, sex/gender and racial/ethnic background; percent change in overall minority enrollment; equity-related complaints; and time elapsed since the last on-site equity review.

Letter of Findings:

The attached LOF summarizes the Department's observation and findings in the following nine areas of review:

- I. Administrative Requirements
- II. Recruitment, Admissions, and Counseling
- III. Accessibility for Students with Disabilities
- IV. Comparable Facilities
- V. Housing in Postsecondary Institutions
- VI. Services for Students with Disabilities
- VII. Financial Assistance
- VIII. Work-Study, Cooperative Programs, and Job Placements
- IX. Employment

The primary purpose of the LOF is to set forth the findings of the visit. Therefore, it includes the visiting team's observations, recommendations and any areas of noncompliance for which corrective actions are required. Please note that recommendations do not require corrective actions (*i.e., not to be included in the Voluntary Compliance Plan*), but if left unresolved, may lead to future non-compliance issues; so please consider acting on the recommendations made by the visiting team as well as the corrective actions. In addition, the review for compliance with state nondiscrimination law (additional protected categories) was included but is not recorded as a part of the federal requirements that form the basis for conducting the onsite review.

All required corrective actions must be included in IVCCD's Voluntary Compliance Plan (VCP), for which a template is attached with the areas of noncompliance already entered. You may choose to use a different format, but at a minimum, your VCP should address each item of noncompliance with the following:

- a description of the corrective action(s) that IVCCD will take to remedy each item
- identification of a target completion date (month and year) for each corrective action
- identification of the individual(s) responsible for completing each corrective action
- a statement of how completion of the corrective action will be verified and reported to the Iowa Department of Education

The Office for Civil Rights requires that implementation of remedies to correct areas of noncompliance be prompt but reasonable in light of each action's difficulty. Typically, remedies are to be completed within a year of the VCP's approval by the Department; however, in the event that a remedy will take longer than a year to complete, the VCP should include a plan for interim measures to address the violations while the long-term remedy is pending.

Please note that the VCP must be **signed and dated by the college president**. Please return your completed, signed VCP to Kelly Friesleben at the Iowa Department of Education within 45 calendar days of the date of this letter (i.e., **on or before Wednesday, May 29, 2024**). This date provides time to negotiate any necessary changes within the 90-day timeframe (from the date of this letter) for the Department to approve your VCP.

Thank you and your team again for your cooperation during the equity review and onsite visit. Your team's time and effort in organizing documents and scheduling interviews was greatly appreciated. If you desire clarification of the contents of the LOF or assistance preparing your VCP, please contact Kelly Friesleben, Education Program Consultant – Student Success, Bureau of Community Colleges and Postsecondary Readiness at (515/868-2847) or kelly.friesleben@iowa.gov. Also, please be aware that Department consultants are available with continued technical assistance for any issue or concern that may arise as your college fulfills its obligation to reach and maintain compliance with all civil rights requirements. Thank you for your cooperation in this matter and your continued interest in ensuring that Iowa's educational programs effectively serve all of our students.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Varner".

Jeremy Varner, Bureau Chief
Bureau of Community Colleges and Postsecondary Readiness

cc: Lisa Breja, Institutional Researcher, IVCCD
Amy Gieseke, Section Chief, Bureau of Community Colleges and Postsecondary Readiness
Kelly Friesleben, Consultant, Bureau of Community Colleges and Postsecondary Readiness
SueAnn Johnson, Administrative Consultant, Bureau of School Improvement



Equity Review – Letter of Findings

Iowa Valley Community College
District

October 18-19, 2023—Fiscal Year 2024



Department of Education

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It is the policy of the Iowa Department of Education not to discriminate on the basis of race, creed, color, sexual orientation, gender identity, national origin, sex, 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. § 2000d2000e), 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, 400 E. 14th Street, Des Moines, IA 50319-0146, telephone number: 515-281-5295, or the Director of the Office for Civil Rights, U.S. Department of Education, John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604-7204, telephone number: 312-730-1560, FAX number: 312-730-1576, TDD number: 800-877-8339, email: OCR.Chicago@ed.gov

Iowa Valley Community College District (IVCCD) Equity Review

I. ADMINISTRATIVE REQUIREMENTS

This section includes issues related to the board policies, the functioning of the equity coordinator, the grievance procedure, and the dissemination of information regarding those three items to parents, staff, students, and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §100.6(d).

Summary of Findings and Analysis:

The visiting equity team from the Iowa Department of Education (Department) interviewed administrators and staff and reviewed documentation provided by Iowa Valley Community College District (IVCCD) to determine whether the college was appropriately providing its annual notice of nondiscrimination.

The annual and continuous nondiscrimination statements are also reviewed during the Department's state accreditation visit, for which guidance was provided to all Iowa community colleges in the fall of 2014, with a recent update provided in December 2023 and is available on the Iowa Department of Education website. That guidance clearly states that each Iowa community college must provide an annual notice of nondiscrimination that includes a brief summary of the college's Career and Technical Education (CTE) offerings and includes program admissions criteria. Furthermore, if the college's service area contains a community of national origin minority, the annual notice must be disseminated to that community in its native language to assure that a lack of English language skills will not be a barrier to admissions. This annual notification must be provided at the start of each academic year and, as indicated above, contain CTE program and admission information not required of the continuous nondiscrimination statement discussed in the next section.

The Department team reviewed IVCCD's external and internal communications, website, board policy and publications and recruiting materials distributed prior to each fall semester to determine that they meet the timeline requirements for the *Annual Notice of Nondiscrimination*. The board reaffirmed their board equity policy statement September 2023.

The 2023-2024 annual notice reviewed (<https://www.iavalley.edu/educational-equity/>) included a statement specifying the bases for nondiscrimination in programs, activities and employment with the list of federal and state protected classes and all of the CTE programs offered. Programs with additional admission requirements were identified in a separate table, however, a link to the page where these requirements could be found was not included. Web links have since been added to the annual notice, but not all of them lead to admissions requirements. Additionally, the annual statement does not identify the Title IX & Section 504 coordinators and their contact information or include the statement regarding limited English proficiency. The annual notice is updated annually and is published on the website under the title *Educational Equity* (<https://www.iavalley.edu/educational-equity/>) by the marketing department, and this website link is also sent out to students via email prior to the start of the school year. Anyone needing the statement in a different language would be able to use their internet browser. IVCCD has identified Spanish as a language spoken in the institution's service area, so it is **recommended** that the *Educational Equity* website include the annual notice in both English and Spanish in addition to relying on browser translations. PDFs of a more comprehensive annual notice in both English and Spanish were provided during the desk review, however, these documents are not widely used and it is the Educational Equity statement on the website that is published publicly and emailed out to students that does not meet all requirements.

Required Corrective Action(s): In order to bring the annual notice into compliance, IVCCD needs to: (1) add the institution's Title IX & Section 504 Coordinator(s) with their required contact information, (2) include the statement that the institution will take steps to assure that the lack of English language skills will not be a barrier to admission and participation, and (3) ensure the links for programs with additional admissions criteria lead to the correct information.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; 28 C.F.R. 35.106.

Summary of Findings and Analysis:

The Department equity team interviewed administrators and staff and reviewed documentation provided by IVCCD to determine whether the college was appropriately providing a continuous notice of nondiscrimination statement.

The team reviewed numerous documents provided during both the desk review and the onsite visit. IVCCD's continuous notice of nondiscrimination includes a statement specifying the bases for nondiscrimination in programs, activities and employment with the list of federal and state protected classes, and contact information for the equity coordinators and OCR office.

During the desk review and site visit, the Department team noted the continuous nondiscrimination statement was either missing or not consistent on the college's website, major publications and student recruiting materials. For example, the statement was missing from the printed sheet listing the Last Dollar Scholarship programs, from the concurrent enrollment and foundation donor contracts, the "IVCCD Faculty Professional Development Plan" (quality faculty plan) and the strategic plan. The team also noted wording discrepancies in the continuous statement across various documents, including course syllabi and the college catalog, during the visit. The college's recent move to a syllabus template in fall 2023 should help alleviate discrepancies among course syllabi, if implemented with consistency and fidelity across the district.

Required Corrective Action(s): IVCCD's continuous notice of nondiscrimination must be consistent in all publications designed for student recruitment, admissions, services and academic programs. The inconsistencies, such as on course syllabi and other documents, may be due to using old templates, as it is clear the college has created new templates with the proper language.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis:

IVCCD leadership informed the visiting team that the college has designated one official equity coordinator, and five Title IX Coordinators. The Vice President of Administration is designated as IVCCD's official equity coordinator as indicated in Board Policy 516. This person also coordinates the institution's Title IX activities. Of the five Title IX Coordinators, one coordinator is specifically for employees, and the other four coordinators each serve a specific campus population for students. This information is shared with both employees and students in a variety of formats and locations including handbooks, trainings, orientations, and an annual email prior to the start of the school year. There is also a dedicated page on the IVCCD website with required Title IX information. The names of the Title IX Coordinators are listed on this page, however, stakeholders need to click on a link to the staff directory to get direct contact information. It is **recommended** that the contact information be listed directly on the website for the coordinators on the Title IX page in order to remove a step for an individual seeking assistance.

Published nondiscrimination statements include the contact information for the equity coordinator. The Department visiting team found that the staff and students interviewed could identify their respective equity contact by name. The students also mentioned they could get help from their faculty and staff contacts, and felt comfortable that they could get help. The team confirmed that staff members were confident that they had been trained to help students through an equity issue, and they would always involve the equity coordinator for student issues.

The Title IX Coordinators have received training in equity-related areas through Ahlers & Cooney. In addition, both Title IX and Vector (Safe Colleges) trainings are required on a regular basis for all faculty, staff and students. The training information is posted prominently on the Title IX website.

In addition, IVCCD has a district employee engagement committee and diversity committees at both their Ellsworth and Marshalltown campuses that help to plan professional development events and fosters diversity among faculty, staff and students.

There was no evidence of a violation.

Required Corrective Action(s): None

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b).

Summary of Findings and Analysis:

The Department equity team reviewed IVCCD's Title IX and Section 504/Title II grievance procedures as well as all grievances reported over the past five years. There are board policies specific to both students and employees for Title IX, Equal Employment Opportunity (EEO) and American's with Disability Act (ADA).

The formal Title IX process may be found in a brochure disseminated to the IVCCD community, on the website with a link in the footer, and in the student, and faculty handbooks. Title IX processes and publications at the college make clear the ability for a complainant to take a complaint to the either the designated Equity Coordinator (Vice President of Administration), to one of the five Title IX Coordinators to discuss both formal and informal reporting options or online via the Title IX reporting form. The website and all documents are in compliance with the most recent Title IX regulations and includes information for both the complainant and respondent on the following: confidentiality, timeframe, supportive or protective measures, investigative process, right to an advisor, appeals, and resolution options which include the right to pursue a formal complaint with the Iowa Civil Rights Commission or federal authorities.

Informal grievance and complaint procedures for students are outline in the student handbook with an additional section outlining steps to follow for grievances related to accommodations. The procedures appropriately describe the steps, expectations and potential outcomes for students. The grievance process also notifies the complainant of the following: the right to end the informal process at any time, the student code of conduct appeal process and the ability to take a complaint to the Iowa College Student Aid Commission (ICSAC) or Iowa Department of Education. Interviews with students confirmed that they knew where to find the grievance procedures and how to begin the process.

The faculty handbook includes the formal Title IX procedure for staff, but it does not include any other grievance procedures or employee-related information. IVCCD does not currently have an employee handbook, but staff indicated there are plans to create one. Currently, the Board Policy Manual is utilized as an employee handbook, which is updated regularly as changes to policies and procedures occur at monthly board meetings. New employees are educated about the policy book via the new hire orientation process. It is **recommended** that IVCCD considers creating an employee handbook as a means to communicate important policies and procedures specific to employees in order to provide the information in a less formal language that may be easier to read and understand. This will also allow a central location where all employees (faculty and staff) to find information needed for grievances, complaints, or other policies and procedures.

The visiting team found that there were three grievances submitted over the past five years. All grievances were documented with the appropriate administrator and each followed the prescribed steps and timelines.

There is no evidence of a violation.

Required Corrective Action(s): None

II. RECRUITMENT, ADMISSIONS AND COUNSELING

A. Admissions Criteria and Access to Classes

Applicable Requirements: *Guidelines* Sections IV.A, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), 104.42(a), (b) and (c), 104.43, 106.21, 106.22, 106.34 and 106.35; 28 C.F.R § 35.130.

Summary of Findings and Analysis:

The Department equity team reviewed IVCCD's website and catalog for detailed admissions criteria listed for each career and technical (CTE) program utilizing criteria beyond the college admissions process, when appropriate. The catalog contains a section that has a description of each CTE program, a plan of study with program requirements including the number of credits available/required. Programs with specific licensing or employment considerations are included in a notes section. The annual statement - titled *Educational Equity* on the website - includes a list of CTE programs and identifies those programs with differing admission requirements with a hyperlink to the specific admission requirements for that program. Some of the links need to be updated, and this was referenced in the previous section specific to the Annual Notice of Nondiscrimination. The general admissions process is clearly defined, and although not required, adding a statement that some programs may have additional criteria and where to find that information would be a good consideration.

Upon completion of a desk review of materials and through interviews, these steps seem to apply to all students, regardless of sex, race, color, national origin or disability. Interviews with CTE students and staff did not raise concerns about any inappropriate application of admissions criteria for CTE programs based on sex, race, color, national origin or disability.

There is no evidence of a violation.

Required Corrective Action(s): None

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L.

Summary of Findings and Analysis:

After a thorough desk review and on-site interviews with students and staff, the Department found no evidence that IVCCD's CTE programs are inaccessible to English Language Learners (ELL). In fact, the college has procedures in place to identify and assess applicants with limited English proficiency and provided examples of course remediation offerings focused on getting the non-native English speakers ready for college-level coursework. The team learned that IVCCD identifies students with limited English Proficiency via the application for admission and then utilizes either the Accuplacer or Michigan Placement exams to determine English proficiency for all non-native English speakers. The results of the exam are utilized to advise students into courses the students are prepared to take using the college's ESL placement guide that clearly indicates exam scores related to placement. English as a Second Language (ESL) classes are available for ELL Students. ESL classes reinforce life skills in English in the areas of reading, writing, speaking and listening. All of these opportunities are designed to improve the student's language skills for success in college-level courses and programs of study. Additionally, the Integrated English Literacy and Civics Education (IELCE) program covers basic English language acquisition skills, and teaches workforce ready skills.

IVCCD also has designated personnel to assist with students with limited English Proficiency, and these individuals help with translation and ensure that students have their questions answered. Additionally, IVCCD offers materials in Spanish either online via the website or in hard copy in their student services areas. The IVCCD website is compatible with the embedded translations for various web browsers. IVCCD has identified a substantial Spanish-speaking population within their service area, and as such they strive to be proactive in meeting the needs of these students so access to the institution will not be an issue.

There was no evidence of a violation.

Required Corrective Action(s): None

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A, V.B, and V.D; 34 C.F.R. §§100.3(a) and (b); 104.47(b), and 106.36; 28 C.F.R. § 35.130.

Summary of Findings and Analysis:

The Department team reviewed several sources of evidence provided by the college and conducted interviews with students and staff from student services, admissions and financial aid. Through this review it is evident that IVCCD is dedicated to ensure counseling procedures are free from stereotyping and strive to avoid discriminatory practices. IVCCD has all requisite policies in place for non-discrimination – including one for pregnant and parenting students. IVCCD uses its CTE program evaluation process and enrollment management plan to analyze CTE program enrollment data and identify disproportionate enrollment in CTE programs. The college's geographic area has a substantial population of non-native speakers of English; therefore, they have implemented strategies to meet the needs of this group of prospective students.

There was no evidence that the college, in practice or policy, discriminates against students based on race, color, national origin, sex or disability in the placement or counseling of students. IVCCD provides diversity training to all faculty and staff at an annual retreat, and also has an academic advisor resource manual to ensure all advisors are providing consistent services to all students.

There is no evidence of a violation.

Required Corrective Action(s): None

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.47(b).

Summary of Findings and Analysis:

Through evidence provided by the college and interviews with staff from admissions, student services and financial aid, the Department team determined that the college provides comparable advising and counseling services to students with limited English-speaking ability and hearing impairments. The college has an academic services/academic advising board policy that outlines services provided to all students, and both ECC and MCC have staff dedicated to providing accommodations for students with disabilities, including hearing impairments. The college also has bilingual staff that help limited English-speaking students with program and career planning, which includes helping them to understand recruiting, admissions and advising materials.

IVCCD offers multiple resources to assist students with limited English language skills or hearing impairments. This includes centralized student support available to all students, as is evidenced by “The Hub” at ECC, and “The Student Success Center” at MCC. As previously mentioned, there are also dedicated staff for advising and accommodations available across the district. IVCCD also utilizes a program called *Mango*, which is a website and mobile app that is an adaptive language-learning service with tools and guidance to assist students with translations and English-language learning.

There is no evidence of a violation.

Required Corrective Action(s): None

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Section V.A, V.C and V. E; 34 C.F.R. §§ 104.42(a) and 106.23(a) & (b).

Summary of Findings and Analysis:

The Department equity team reviewed program enrollment material, including the college catalog, college policies, course descriptions, CTE program brochures, the college website and course schedules. Although there is disproportionate enrollment by some demographics in some CTE programs, there is no evidence that IVCCD’s promotional materials or activities create or perpetuate stereotypes or restrictions based on race, color, national origin, sex or disability.

One of the reasons IVCCD was selected to receive a focused equity visit was because of some disproportionate enrollment in CTE courses by sex, race and disability. To address CTE programs that have disproportionate enrollments, the college has reports disaggregated by student demographics that are provided to admissions and recruitment staff to aid in the building of their enrollment plan, and has also taken the following steps:

- Reaching out to diverse populations in the district (first generation, Hispanic and Latinx populations, females in nontraditional career areas) through events such as their First Generation Friday, Panther Partners and Ellsworth without borders.
- The college has bilingual staff to meet with prospective students and their families in order to provide translation and assistance with understanding admission information. Resources such as Mango and internet browser translations can be used to provide translation to additional languages as needed.
- Marketing materials are used to promote various events and activities to recruit diverse student populations, and are reviewed to show representation of the diverse population at IVCCD, with some materials published in Spanish.

There was no evidence of a violation.

Required Corrective Action(s): None

III. ACCESSIBILITY FOR STUDENTS WITH DISABILITIES

This section includes a review of the accessibility of facilities and instructional program for students, staff, parents and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

On April 27-28, 2023, DE consultants reviewed the Iowa Valley Community College District campuses in Grinnell, Iowa Falls, and Grinnell, Iowa. The purpose of the review was to verify accessibility in the following areas: parking, passenger loading zones, exterior route of travel, ramps, stairs, lifts, entrances, lobbies and corridors, elevators, rooms and spaces, restrooms, shower rooms, assembly areas, cafeterias, and libraries. The tables on the following pages document the buildings reviewed and compliance issues discovered. The appropriate American with Disability Act (ADA) standards are provided in each “Building Information” table for the college’s reference. These standards are based on each building’s year of construction or the most recent renovation – dates provided by the college.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

The DE facility reviewers were accompanied by Dave Henry (ECC), MaryAnne Nickle (IVCC-Grinnell), and Chris Bland (MCC). The following buildings were included in the review.

Ellsworth Community College, 709 Ellsworth Avenue, Iowa Falls, IA 50126

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Agriculture and Renewable Energy Center	2009	1991 ADA Standards
Equine Center	2012	2010 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Written Plan	For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high school that are inaccessible are made available to students, staff, parents, and community members with disabilities.	Programs within facility must be readily accessible	Programs within facility must be readily accessible
Parking	The parking lot has 93 stalls with 7 handicap accessible stalls. The lot is required to have at least 1 van accessible stall. The college will need to add 1 van accessible stall with the appropriate signage.	ADA Standard 4.6.4, 4.30.7	ADA Standard 4.6.4, 4.30.7
Rooms and Spaces	The Bio-Tech lab/room has fixed tables that are too high to accessible. A table with a counter top between 28 and 34 inches high needs to be provided.	ADA Standard 4.32.4	ADA Standard 4.32.4
Toilet Rooms	The women's restroom had hot water pipes that were not appropriately covered.	ADA Standard 4.19.4	ADA Standard 4.19.4

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Trades and Industry Building	1983	1991 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Parking	New parking south of T&I Building needs 1 van accessible parking stall with the appropriate signage.	ADA Standard 4.1.2(5)(b), 4.6.5	ADA Standard 4.1.2(5)(b), 4.6.5
Entrances	South Door: Needs handicap accessible sign. North and West Doors: Need appropriate signage with arrows pointing to the accessible entrance.	4.1.3(8)(d), 4.30 4.1.2(7)(c), 4.30	4.1.3(8)(d), 4.30 4.1.2(7)(c), 4.30
Toilet Rooms	Men and Women's rest rooms need hot water pipes covered.	4.19.4	4.19.4

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Science and Math Building	1972	1991 ADA Standards
	Renovation: 2003	

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Entrances	Accessible entrances must be identified by the international symbol of accessibility. West Entrance.	ADA Standard 4.1.2(7)(c);4.30	ADA Standard 4.1.2(7)(c);4.30
	Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance. North entrance.	4.1.3(8)(d), 4.30	4.1.3(8)(d), 4.30
Exterior Route of Travel	Sidewalk to Math and Science Building.	4.1.2(2), 4.3.2(2)	4.1.2(2), 4.3.2(2)
Parking	Need 1 extra handicap accessible stall north of the building.	4.1.2(5)(a), 4.6.1	4.1.2(5)(a), 4.6.1

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Reg Johnson Hall	1991	1991 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Exterior Route of Travel	Sidewalks to North, South, and East entrances need repairs.	4.1.2(2), 4.3.2(2)	4.1.2(2), 4.3.2(2)

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
McClure Hall	1969	1991 ADA Standards
	Renovation: 2012	

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Entrances	Accessible entrances must be identified by the international symbol of accessibility.	ADA Standard 4.1.2(7)(c);4.30	ADA Standard 4.1.2(7)(c);4.30
	Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance.	4.1.3(8)(d), 4.30	4.1.3(8)(d), 4.30
Exterior Route of Travel	Sidewalk to McClure Building from handicap parking spot to handicap entrance.	4.1.2(2), 4.3.2(2)	4.1.2(2), 4.3.2(2)

Iowa Valley Community College-Grinnell, 123 6th Avenue West, Grinnell, IA 50112**Building Information:**

Building / Additions	Construction Year	Applicable Review Standard
Main Building	2002	1991 ADA Standards
	Renovation: 2007, 2010, 2022	

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Parking	Need 1 van accessible stall in the main parking lot.	4.1.2(5)(b), 4.6.5	4.1.2(5)(b), 4.6.5

Marshalltown Community College, 1100 College Avenue, Marshalltown, IA 50158**Building Information:**

Building / Additions	Construction Year	Applicable Review Standard
Welding, Business and Technology Center	2007	1991 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
Entrances	Accessible entrances must be identified by the international symbol of accessibility.	ADA Standard 4.1.2(7)(c);4.30	ADA Standard 4.1.2(7)(c);4.30
Exterior Route of Travel	Entrance area to the building has a lip that is too high.	4.3.8, 4.5.2	4.3.8, 4.5.2

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Main Building	1969	1991 ADA Standards
	1999, 2003, 2008, 2013, 2016, 2022	

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
No compliance issues found.			

Building Information:

Building / Additions	Construction Year	Applicable Review Standard
Health Occupations Wing	2013	2010 ADA Standards

Compliance Issues:

Area of non-compliance	Compliance issue	Review Standard	Remediation Standard
No compliance issues found.			

Summary

The items to be addressed on the Ellsworth Community College campus are listed below. If any of the areas in the pre-1977 portions of the building are inaccessible, the school must submit a written plan describing how the programs and services in the pre-1977 portions of the building are made available to students, staff, parents and community members with disabilities.

- Parking: appropriate number of handicap accessible and van accessible parking stalls, with appropriate signage.
- Rooms and Spaces: appropriate accessible table height in labs and classrooms as noted.
- Toilet Rooms: appropriate covering of hot water pipes as noted.
- Entrances: appropriate handicap accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.
- Exterior Route of Travel: appropriate installation and repair of sidewalks as noted.

The items to be addressed on the Iowa Valley Community College - Grinnell campus are listed below. If any of the areas in the pre-1977 portions of the building are inaccessible, the school must submit a written plan describing how the programs and services in the pre-1977 portions of the building are made available to students, staff, parents, and community members with disabilities.

- Parking: appropriate number of handicap accessible and van accessible parking stalls, with appropriate signage.

The items to be addressed on the Marshalltown Community College campus are listed below. If any of the areas in the pre-1977 portions of the building are inaccessible, the school must submit a written plan describing how the programs and services in the pre-1977 portions of the building are made available to students, staff, parents, and community members with disabilities.

- Entrances: appropriate handicap accessible and non-accessible, with an arrow to the accessible entrance, signage needed as noted.
- Exterior Route of Travel: appropriate installation and repair of sidewalks as noted.

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

- Describe in detail the methods that will be used to make the facilities and/or programs accessible; and
- Specify the schedule for taking steps necessary to achieve full program accessibility and, if the time period of the transition plan is longer than one year, identify the steps that will be taken during each year of the transition period; and indicate the person responsible for implementation of the plan.

Section 504 of the Rehabilitation Act of 1973, 34 CFR Part 104.22 Existing facilities; 34CFR Part 104.23 New construction. Americans with Disabilities Act, 1990 Title II: 28CFR35 –Section 35.150(d) Existing facilities.

IV. COMPARABLE FACILITIES

A. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; and 34 C.F.R. §106.33

Summary of Findings and Analysis:

Iowa Valley Community College District has separate toilet rooms for male and female students. These facilities were reviewed and the toilet rooms were determined to be comparable in number and condition. No violations were witnessed. 34 CFR §1

There was no evidence of a violation.

Required Corrective Action(s): None

V. HOUSING IN POSTSECONDARY INSTITUTIONS

This section includes a review of the accessibility of and policies associated with on-campus housing provided for students with disabilities.

Applicable Requirements: *Guidelines* Section VI.C; 34 C.F.R. § 100.3(b), 104.45, and 106.32

Summary of Findings and Analysis:

IVCCD has residence halls at both ECC and MCC. Both ECC and MCC have housing application processes that are the same for all students attending their campuses. The housing application is available online, along with the residence hall housing policy and procedures manual, which includes information on Title IX and other key contacts, ADA accessibility procedures, grievance procedures, service and assistance animal policies and safety information for students. The housing rules and regulations document itself is very clear and informative. Housing students receive regular training on safety and grievance or sexual misconduct (Title IX) processes through Vector (Safe Colleges). The residence halls have rooms available for accessibility needs and a policy specific to service animals.

Based on the information provided, there was no evidence of a violation.

Required Corrective Action(s): None

VI. SERVICES FOR STUDENTS WITH DISABILITIES

This section includes a review of the support services, accommodations and educational programming provided for students with disabilities (Special Education/Section 504).

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§104.4(a), 104.43 and 104.44; 28 C.F.R. §§ 35.130, and 35.160-35.163.

Summary of Findings and Analysis:

Students with disabilities are to be served in the least restrictive way possible. Program modifications are to be made to allow the involvement of English language learners as well. Postsecondary Institutions may require students to follow reasonable procedures to request an academic adjustment and students are responsible for knowing and following those procedures. If the documentation submitted does not meet the college's requirements, a school official should tell students in a timely manner what additional documentation they need to provide.

The Department team found evidence of a consistent process for the implementation of a Section 504 program integral for ensuring identification, development and implementation of individual accommodations for eligible students. The attention paid to students with special needs is noteworthy and students indicated they knew of or had an individual they could turn to if they needed an accommodation. In addition to interviews, the Department team reviewed the following documents provided by IVCCD: a random sample of student accommodations over the past five years, the student handbook, the faculty handbook, related board policies, course syllabi, the student orientation materials, the accommodations procedures, training materials and application and the college's website. There were some noted differences between communication sent to students based on campus location, but staff indicated they would review the information to ensure consistency in message and timeframe. Faculty, adjunct faculty and staff are trained on accommodations for students with a disability. Based on the materials reviewed and interviews with students and key staff, IVCCD appears to have services in place that work with students in an interactive process to identify an appropriate academic adjustment.

There was no evidence of a violation.

Required Corrective Action(s): None

VII. FINANCIAL ASSISTANCE

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), 104.46, and 106.37.

Summary of Findings and Analysis:

Colleges are not to limit honors, awards and scholarships to a group on the basis of sex, race, color, national origin or disability unless such targeting is done to provide opportunities to members of a group that has traditionally been underrepresented. A college may administer or assist in the administration of financial assistance through scholarships, fellowships or other forms that may require that awards go to a student of a particular sex, race, color, national origin or with a particular disability; however, the overall effect of such restricted awards must not result in discrimination in access to total scholarships on the basis of sex, race, color, national origin or disability. Outside agencies and donors that provide financial assistance are to be notified of the college's nondiscrimination policy.

IVCCD provides and administers financial assistance to its students. The Department visiting team reviewed IVCCD'S documentation including financial aid and scholarship applications and scholarship information, materials available to students on its website and in the financial aid office, and award data for the past three years. The team interviewed the Director of Financial Aid, Associate Director of Financial Aid and other campus leadership in order to learn about the college's process and procedures for informing students about financial requirements and opportunities. The team also reviewed the process and procedures established in the financial aid office and found that all financial aid processes are inclusive of all students. ECC has an online scholarship application, which may also be printed or provided in hard copy as needed. MCC does not have a separate scholarship application, as the application for admission automatically places students in consideration for scholarships. Both colleges also have applications through their foundations for additional opportunities. The college has a strong connection with the community that is reflected in the FAFSA nights they hold in collaboration with local school districts. Both ECC and MCC have online financial aid guides that provides information and resources, which can be translated into other languages via the web browser or the Mango app. Additionally, staff are available to meet with students individually to assist with FAFSA completion, scholarship applications and any other financial aid questions or needs a student may have.

There was no evidence that the college discriminated against students on the basis of race, color, national origin, sex or disability in its administration of financial assistance.

Required Corrective Action(s): None

VIII. WORK STUDY, COOPERATIVE PROGRAMS AND JOB PLACEMENT

This section includes a review of contracts with all employers or other sponsors offering work study, cooperative education, job placement and apprenticeship programs and the application materials that students complete to obtain these positions.

A. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. §§ 100.3(a) and (b), 104.4(a) and (b), 106.31, and 106.38(a).

Summary of Findings and Analysis:

The Department equity team reviewed IVCCD's contracts and memoranda of understanding (MOU) with employers or other sponsors offering work study, cooperative education, job placement, clinical and apprenticeship program opportunities and the student work study employment approval form and handbook. The contracts contained an assurance that the employer or sponsor does not discriminate against students on the basis of race, color, national origin, sex or disability.

Based on interviews with students and staff, there was no evidence that students had been limited from internship or employment opportunities on the basis of their race, color, national origin, sex or disability.

Required Corrective Action(s): None

IX. EMPLOYMENT

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§ 104.11-104.14 and 106.51-106.61.

Summary of Findings and Analysis:

The Department team reviewed documentation submitted by the college which included sample job descriptions, job vacancy notices, administrative procedures on hiring, the faculty and employee handbooks, and the classification and pay guide. The team interviewed the director of human resources to learn more details about college hiring processes. The interviews of various employee groups showed that they were knowledgeable about the equity coordinators and grievance processes. Staff and faculty also shared information about the equity and Title IX trainings in which they had participated.

The nondiscrimination statement was included in all reviewed position vacancy notices, the employee handbook and the hiring process guide. The salary classification schedules are differentiated by job classification, all of which are clearly documented. The college utilizes Iowa Works and Indeed to recruit staff and faculty, and athletics utilizes the NCAA market place. Publications and policies from human resources seem free of bias and have required statements.

There is no indication that the college discriminates in hiring or pay based on race, color, national origin, sex or disability.

There is no evidence of a violation.

Required Corrective Action(s): None

**ATTACHMENT B
AREAS OF NONCOMPLIANCE
EQUITY VOLUNTARY COMPLIANCE PLAN (VCP)
Iowa Valley Community College district**

Required Corrective Action	Specific remedies to correct	Evidence needed to verify remedy	Staff member(s) responsible	Timeline for completion
Section I. <u>Administrative Requirements</u>			Name, Title	Month, Year
A. Annual Notice of Nondiscrimination In order to bring the annual notice into compliance, IVCCD needs to: (1) add the institution's Title IX & Section 504 Coordinator(s) with their required contact information, (2) include the statement that the institution will take steps to assure that the lack of English language skills will not be a barrier to admission and participation, and (3) ensure the links for programs with additional admissions criteria lead to the correct information.				
B. Continuous Notice of Nondiscrimination IVCCD's continuous notice of nondiscrimination must be consistent in all publications designed for student recruitment, admissions, services, and academic programs. The inconsistencies, such as on course syllabi and other documents, may be due to using old templates, as it is clear the college has created new templates with the proper language.				
Section III. <u>Accessibility for Students with Disabilities</u>			Name, Title	Month, Year
<u>Written Plan</u> - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are made available to students, staff, parents, and community members with disabilities.				

<p>ECC Ag and Renewable Energy Center/ Parking: The parking lot has 93 stalls with 7 handicap accessible stalls. The lot is required to have at least 1 van accessible stall. The college will need to add 1 van accessible stall with the appropriate signage.</p>				
<p>ECC Ag and Renewable Energy Center/ Spaces and Rooms: The Bio-Tech lab/room has fixed tables that are too high to accessible. A table with a counter top between 28 and 34 inches high needs to be provided.</p>				
<p>ECC Ag and Renewable Energy Center/ Toilet Rooms: The women's restroom had hot water pipes that were not appropriately covered.</p>				
<p>ECC Trades and Industry Building/ Parking: New parking south of T&I Building needs 1 van accessible parking stall with the appropriate signage.</p>				
<p>ECC Trades and Industry Building/ Entrances: South Door: Needs handicap accessible sing. North and West Doors: Need appropriate signage with arrows pointing to the accessible entrance.</p>				

<p>ECC Trades and Industry Building/Toilet Rooms: Men and Women's rest rooms need hot water pipes covered.</p>				
<p>ECC Science and Math Building/ Entrances: Accessible entrances must be identified by the international symbol of accessibility. West Entrance.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance. North entrance.</p>				
<p>ECC Science and Math Building/Exterior Route of Travel: Sidewalk to Math and Science Building.</p>				
<p>ECC Science and Math Building/Parking: Need 1 extra handicap accessible stall north of the building.</p>				
<p>ECC Reg Johnson Hall/Exterior Route of Travel: Sidewalks to North, South, and East entrances need repairs.</p>				

<p>ECC McClure Hall/Entrances: Accessible entrances must be identified by the international symbol of accessibility.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance.</p>				
<p>ECC McClure Hall/Exterior Route of Travel: Sidewalk to McClure Building from handicap parking spot to handicap entrance.</p>				
<p>IVCC-Grinnell Main Building/Parking: Need 1 van accessible stall in the main parking lot.</p>				
<p>MCC Welding, Business and Technology Center/Entrances: Accessible entrances must be identified by the international symbol of accessibility.</p>				
<p>MCC Welding, Business and Technology Center/Exterior Route of Travel: Entrance area to the building has a lip that is too high.</p>				

Signature of President

Date

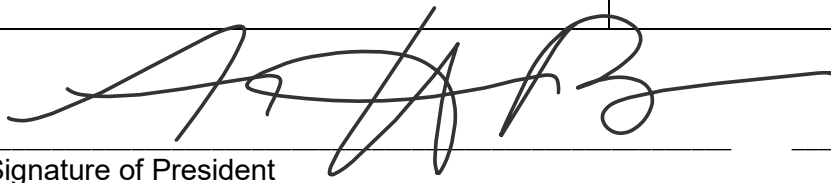
**ATTACHMENT B
AREAS OF NONCOMPLIANCE
EQUITY VOLUNTARY COMPLIANCE PLAN (VCP)
Iowa Valley Community College district**

Required Corrective Action	Specific remedies to correct	Evidence needed to verify remedy	Staff member(s) responsible	Timeline for completion
Section I. <u>Administrative Requirements</u>			Name, Title	Month, Year
A. Annual Notice of Nondiscrimination In order to bring the annual notice into compliance, IVCCD needs to: (1) add the institution's Title IX & Section 504 Coordinator(s) with their required contact information, (2) include the statement that the institution will take steps to assure that the lack of English language skills will not be a barrier to admission and participation, and (3) ensure the links for programs with additional admissions criteria lead to the correct information.	Updated website and catalog	Review of website and catalog	Julie Eastridge, Director of Marketing; Ashtyn Beek, Dean of Academics, Grinnell Campus; Honorina Balough, Dean of Academics, ECC; Title IX Coordinators, Nate Chua & Tracy Crippin-Haake	February 2024
B. Continuous Notice of Nondiscrimination IVCCD's continuous notice of nondiscrimination must be consistent in all publications designed for student recruitment, admissions, services, and academic programs. The inconsistencies, such as on course syllabi and other documents, may be due to using old templates, as it is clear the college has created new templates with the proper language.	Updated website, printed publications, and Simple Syllabus template	Review of website, printed publications and syllabi	Julie Eastridge, Director of Marketing; Ashtyn Beek, Dean of Academics, Grinnell Campus; Honorina Balough, Dean of Academics, ECC	August 2024
Section III. <u>Accessibility for Students with Disabilities</u>			Name, Title	Month, Year
<u>Written Plan</u> - For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school is required to have a written plan that describes how the programs and services in the pre-1977 portions of the school that are inaccessible are				

made available to students, staff, parents, and community members with disabilities.				
ECC Ag and Renewable Energy Center/ Parking: The parking lot has 93 stalls with 7 handicap accessible stalls. The lot is required to have at least 1 van accessible stall. The college will need to add 1 van accessible stall with the appropriate signage.	Repaint parking lot and add a van accessible stall.	Photos of parking lot and stall	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024
ECC Ag and Renewable Energy Center/ Spaces and Rooms: The Bio-Tech lab/room has fixed tables that are too high to accessible. A table with a counter top between 28 and 34 inches high needs to be provided.	Add additional accessible table to classroom	Photo of table	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024
ECC Ag and Renewable Energy Center/ Toilet Rooms: The women's restroom had hot water pipes that were not appropriately covered.	Hot water pipes properly insulated/covered	Photo of sink and underneath	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024
ECC Trades and Industry Building/ Parking: New parking south of T&I Building needs 1 van accessible parking stall with the appropriate signage.	Repaint parking lot and add a van accessible stall.	Photos of parking lot and stall	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024
ECC Trades and Industry Building/ Entrances: South Door: Needs handicap accessible sing. North and West Doors: Need appropriate signage with arrows pointing to the accessible entrance.	Signage installation	Photos of signage	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024

<p>ECC Trades and Industry Building/Toilet Rooms: Men and Women's rest rooms need hot water pipes covered.</p>	<p>Hot water pipes properly insulated/covered</p>	<p>Photo of sink and underneath</p>	<p>Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost</p>	<p>August 2024</p>
<p>ECC Science and Math Building/ Entrances: Accessible entrances must be identified by the international symbol of accessibility. West Entrance.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance. North entrance.</p>	<p>Signage installed</p>	<p>Photos of signage</p>	<p>Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost</p>	<p>August 2024</p>
<p>ECC Science and Math Building/Exterior Route of Travel: Sidewalk to Math and Science Building.</p>	<p>Repair sidewalk</p>	<p>Photos of repaired sidewalk</p>	<p>Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost</p>	<p>May 2025</p>
<p>ECC Science and Math Building/Parking: Need 1 extra handicap accessible stall north of the building.</p>	<p>Repaint parking lot and add a van accessible stall.</p>	<p>Photos of parking lot and stall</p>	<p>Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost</p>	<p>August 2024</p>
<p>ECC Reg Johnson Hall/Exterior Route of Travel: Sidewalks to North, South, and East entrances need repairs.</p>	<p>Repair sidewalk</p>	<p>Photos of repaired sidewalk</p>	<p>Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost</p>	<p>May 2025</p>

<p>ECC McClure Hall/Entrances: Accessible entrances must be identified by the international symbol of accessibility.</p> <p>Not all entrances that are inaccessible have signs indicating the location of the nearest accessible entrance.</p>	Signage installation	Photos of signage	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	August 2024
<p>ECC McClure Hall/Exterior Route of Travel: Sidewalk to McClure Building from handicap parking spot to handicap entrance.</p>	Signage installation	Photos of signage to entrance	Dave Henry, ECC Physical Plant Supervisor; Barb Klein, ECC Provost	May 2025
<p>IVCC-Grinnell Main Building/Parking: Need 1 van accessible stall in the main parking lot.</p>	Repaint parking lot and add a van accessible stall.	Photos of parking lot and stall	Chris Bland, MCC/IVG Physical Plant Supervisor; Ashtyn Beek, Dean of Grinnell Center	August 2024
<p>MCC Welding, Business and Technology Center/Entrances: Accessible entrances must be identified by the international symbol of accessibility.</p>	Signage installation	Photos of signage	Chris Bland, MCC/IVG Physical Plant Supervisor; Matt Schmit, MCC Provost	August 2024
<p>MCC Welding, Business and Technology Center/Exterior Route of Travel: Entrance area to the building has a lip that is too high.</p>	Repair of entrance lip	Photos of repaired entrance	Chris Bland, MCC/IVG Physical Plant Supervisor; Matt Schmit, MCC Provost	May 2025



5-31-24

Date

Signature of President

Monitoring of Pre-2022 Selected Subrecipients

As of the date of the U.S. Department of Education's Office for Civil Rights response to Iowa's MOA report on June 2, 2023, there were thirty outstanding noncompliance items for LEAs from previous reporting cycles. Monitoring and technical assistance were prioritized during the summer and fall of 2023, and all items were completed and closed by February 9, 2024 (Webster City CSD).

The number of items by district were as follows:

East Marshall CSD: 19 ADA items

Linn-Mar CSD: Missing documentation for one item

Moulton-Udell CSD: 4 ADA items

Webster City CSD: 2 ADA items

West Burlington CSD: 4 ADA items

East Marshall Community School District

Fwd: Incomplete Equity Corrective Actions

3 messages

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 7:54 PM

Please save the entire chain.

----- Forwarded message -----

From: **Campbell, Buffy** <buffy.campbell@iowa.gov>
Date: Thu, May 25, 2023 at 2:47 PM
Subject: Incomplete Equity Corrective Actions
To: East Marshall [Supt] LEADistrictSuperintendents <tryan@e-marshall.k12.ia.us>
Cc: Dryer, Scott <scott.dryer@iowa.gov>, Heitz, Eric [IDOE] <eric.heitz@iowa.gov>, Sueann Johnson <sueann.johnson@iowa.gov>

Good afternoon Tony,

In checking the Corrective Actions section of CASA, it appears that the documentation for the Equity Corrective Actions for East Marshall have not been updated, or documentation uploaded and submitted for review.

In order to provide the district with support in completion of the Equity Review, which was conducted on June 2, 2022, a team will visit East Marshall CSD on Thursday, June 22, 2023, arriving at 1:30 pm. The visit will begin at the high school, located in LeGrand. When the walk through and discussion of incomplete non-compliance items is complete, the team will continue the review at the East Marshall Middle School, located in Gilman.

The site visit team will include Scott Dryer, Sueann Johnson, Eric Heitz, and me. Please plan at least 2 hours for this visit. You don't have to make any special arrangements for the visit, other than ensuring that you and Todd Golding, Building, Grounds and Transportation Coordinator, are present and ready to participate in the visit and conversation.

If the requested photographic documentation for each of the corrective actions is submitted prior to the June 22nd visit, I will review the artifacts provided. Once all of the corrective actions have been resolved, if prior to June 22, you will be notified regarding the status of the site visit.

Schedule for Visit - Thursday, June 22, 2023

1:30 pm Site visit team arrives - East Marshall HS, LeGrand Iowa
201 North Franklin
Meet in HS Principal office - review incomplete corrective actions,
photographic documentation, and walk-through of facilities

2:30 pm Travel to East Marshall MS, Gilman, Iowa
225 South Elm Street
Meet in MS Principal office - review incomplete corrective actions,
photographic documentation, and walk-through of facilities

If you need assistance in uploading documentation, or have any questions, please don't hesitate to get in touch. Questions regarding uploading documentation or the site visit may be directed to me. If you have questions related to any of the specifics or finer grain details of the corrective action resulting from the on-sight review of the buildings and grounds, please reach out to Scott Dryer.

Sincerely,
Buffy Campbell

--

Buffy Campbell

School Improvement Consultant - Central Rivers and Keystone AEA's

Home School Contact

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

Cell Phone: 515-954-8651

Buffycampbell@iowa.gov

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--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:04 PM

----- Forwarded message -----

From: **Campbell, Buffy** <buffy.campbell@iowa.gov>
Date: Tue, May 30, 2023 at 2:03 PM
Subject: Re: Incomplete Equity Corrective Actions
To: Tony Ryan <tryan@e-marshall.k12.ia.us>
Cc: Dryer, Scott <scott.dryer@iowa.gov>, Heitz, Eric [IDOE] <eric.heitz@iowa.gov>, Sueann Johnson <sueann.johnson@iowa.gov>

Tony,

I will be joining Scott Dryer tomorrow afternoon, and have a Google Document ready to add photos for you. I have included you in the Share permissions, and am including a link to the document: [East Marshall Equity Corrective Action Summary](#)

I am happy to help with the process.

Best,
Buffy Campbell

On Thu, May 25, 2023 at 3:18 PM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:
Hi Buffy,

Most of the items have been addressed. I am having challenges reporting the documentation as it is requested. The report itself is not user friendly or easy to read when it references Iowa code but has limited details of the specific place in the building it is referencing. The document is difficult to follow.

We are willing to provide the tour. I would like a more user friendly document, if possible.

Regards,
Tony

[Quoted text hidden]

Anthony P. Ryan

Superintendent of Schools

East Marshall Community School District

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[Quoted text hidden]

Johnson, SueAnn <sueann.johnson@iowa.gov>

To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:46 PM

[Quoted text hidden]

Fwd: Incomplete Equity Corrective Actions

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 7:54 PM

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Buffy Campbell
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Buffy Campbell

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Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov

Website: <https://educateiowa.gov/>



Department of Education

Fwd: East Marshall reply

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:12 PM

----- Forwarded message -----

From: **Heitz, Eric** <eric.heitz@iowa.gov>
Date: Fri, May 26, 2023 at 11:00 AM
Subject: Re: East Marshall reply
To: Dryer, Scott <scott.dryer@iowa.gov>
Cc: Johnson, SueAnn <sueann.johnson@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>

Thanks Scott

Eric Heitz
Administrative Consultant
Iowa Department of Education
Grimes State Office Building
Phone: 515-326-1018
Email: eric.heitz@iowa.gov

Office hours

Monday - Friday
8:00 am - 4:30 pm

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Sounds like the following is a plan:

- *Contact Tony at East Marshall for a 1:1 visit for next week, giving the district about a month to complete the process by our June 22 visit.
- *Share results of the visit with this team next week.
- *Assist Tony with the documentation process.

I will try to set this up today, or early next week.

Thanks,

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD
Education Program Consultant - School Finance
Bureau of School Business Operations
Iowa Department of Education
Grimes Office Building; 3rd Floor

400 East 14th Street

Des Moines, Iowa 50319-0146

IDOE Cell Phone: 515-402-8700

scott.dryer@iowa.gov

Summer office hours (June 2 - August 17, 2023)

Monday - Thursday

7:30 am - 5:00 pm

Friday

8:00 am - 12:00 pm

On Fri, May 26, 2023 at 10:45 AM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:
Following along with all of this- still learning! Everything discussed sounds good to me.

SueAnn

On Fri, May 26, 2023 at 10:34 AM Heitz, Eric <eric.heitz@iowa.gov> wrote:
Sounds good to me. Thanks Scott.

Eric Heitz

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Iowa Department of Education

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On Fri, May 26, 2023 at 9:29 AM Dryer, Scott <scott.dryer@iowa.gov> wrote:
Good Morning (again),

If the group would like for me to visit Tony at East Marshall, I am happy to schedule that for next week. Unfortunately, an issue just came up that will have me occupied for the remainder of the day after 1:15 AM today.

I can contact Tony to set up a meeting sometime early next week if that is how we would like to proceed.

Thank you,

Scott

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On Fri, May 26, 2023 at 8:47 AM Campbell, Buffy <buffy.campbell@iowa.gov> wrote:

I think that would be a great idea. If you have time, and Eric/Sueann are ok with it - thank you!

If you like, you are welcome to share the Google doc that I created. He could upload the photos and other documentation to it, and we would all have access.

Best,
Buffy

On Fri, May 26, 2023 at 8:44 AM Dryer, Scott <scott.dryer@iowa.gov> wrote:

Buffy,

This sounds good.

I have to go to Marshalltown today after work to pick up something for my mother-in-law. If Tony is available I would be happy to pop over to East Marshall to review the documents, chart a map, and help him troubleshoot his issues with documenting their progress. This would give him a month to finish up prior to our visit in June. Of course this would be pending his availability to meet this afternoon.

Thoughts?

Scott

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On Fri, May 26, 2023 at 8:17 AM Campbell, Buffy <buffy.campbell@iowa.gov> wrote:

Scott,

What do you think about sending Tony a copy of Attachment A and requesting a map of both buildings so that you could label it? I am a bit confused as to how he could have photos to document what has been done, but doesn't seem

able to pair them with the corresponding corrective action.

Buffy

On Fri, May 26, 2023 at 8:13 AM Dryer, Scott <scott.dryer@iowa.gov> wrote:

Buffy,

If Tony could provide a map of each building, I would be happy to document the items and locations of noncompliance during our visit on the 22nd.

This would leave him with this information for those areas that are still noncompliant. I am a tad confused by his lack of understanding as to the items indicated on the ATTACHMENT A / Areas of Noncompliance document. I read back through it and it is very clear to me what is being asked for, and by the nature of their campuses, where each item is located.

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD

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On Thu, May 25, 2023 at 4:09 PM Campbell, Buffy <buffy.campbell@iowa.gov> wrote:

Afternoon all!

What are your thoughts on this? I could share the google doc that I am working on and have him upload pics to it but, I am struggling with that. I have offered multiple times to help him set up a single word document to upload photos by citation number, both in email and by phone. Now - he says he doesn't understand what he is to do.

My question is how did he know what to take pictures of if he wasn't sure what the corrective action was referring to?

The upside to sharing the google doc is that we all have access in a single location to the information.

I am open to whatever you as a group feel is most efficient.

Best,
Buffy

--

Buffy Campbell

School Improvement Consultant - Central Rivers and Keystone AEA's

Home School Contact

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

Cell Phone: 515-954-8651

Buffycampbell@iowa.gov

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Department of Education

Fwd: East Marshall reply

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:12 PM

----- Forwarded message -----

From: **Heitz, Eric** <eric.heitz@iowa.gov>

Date: Fri, May 26, 2023 at 11:00 AM

Subject: Re: East Marshall reply

To: Dryer, Scott <scott.dryer@iowa.gov>

Cc: Johnson, SueAnn <sueann.johnson@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>

Thanks Scott

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Thoughts?

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD

Education Program Consultant - School Finance

Bureau of School Business Operations

Iowa Department of Education

Grimes Office Building; 3rd Floor

400 East 14th Street

Des Moines, Iowa 50319-0146

IDOE Cell Phone: 515-402-8700

scott.dryer@iowa.gov

Summer office hours (June 2 - August 17, 2023)

Monday - Thursday

7:30 am - 5:00 pm

Friday

8:00 am - 12:00 pm

On Fri, May 26, 2023 at 8:17 AM Campbell, Buffy <buffy.campbell@iowa.gov> wrote:

Scott,

What do you think about sending Tony a copy of Attachment A and requesting a map of both buildings so that you could label it? I am a bit confused as to how he could have photos to document what has been done, but doesn't seem

able to pair them with the corresponding corrective action.

Buffy

On Fri, May 26, 2023 at 8:13 AM Dryer, Scott <scott.dryer@iowa.gov> wrote:

Buffy,

If Tony could provide a map of each building, I would be happy to document the items and locations of noncompliance during our visit on the 22nd.

This would leave him with this information for those areas that are still noncompliant. I am a tad confused by his lack of understanding as to the items indicated on the ATTACHMENT A / Areas of Noncompliance document. I read back through it and it is very clear to me what is being asked for, and by the nature of their campuses, where each item is located.

Scott

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On Thu, May 25, 2023 at 4:09 PM Campbell, Buffy <buffy.campbell@iowa.gov> wrote:

Afternoon all!

What are your thoughts on this? I could share the google doc that I am working on and have him upload pics to it but, I am struggling with that. I have offered multiple times to help him set up a single word document to upload photos by citation number, both in email and by phone. Now - he says he doesn't understand what he is to do.

My question is how did he know what to take pictures of if he wasn't sure what the corrective action was referring to?

The upside to sharing the google doc is that we all have access in a single location to the information.

I am open to whatever you as a group feel is most efficient.

Best,
Buffy

--

Buffy Campbell

School Improvement Consultant - Central Rivers and Keystone AEA's

Home School Contact

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

Cell Phone: 515-954-8651

Buffycampbell@iowa.gov

Regular Office Hours: Monday - Friday, 8:00 am to 4:30 pm.

NOTICE TO RECIPIENT: This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

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--

Buffycampbell

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Buffycampbell@iowa.gov

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--

Buffycampbell

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--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-336-3942
sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday
8:00 am - 4:30 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
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Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Department of Education

Fwd: ADA Visit

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:28 PM

----- Forwarded message -----

From: **Dryer, Scott** <scott.dryer@iowa.gov>

Date: Tue, May 30, 2023 at 8:42 AM

Subject: Re: ADA Visit

To: SueAnn Johnson <sueann.johnson@iowa.gov>, Buffy Campbell <buffy.campbell@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>

Good Morning again,

Tony and I have locked down a time that works now that a meeting has been moved in my schedule.

I will be meeting Tony at 1:00 PM, Wednesday, May 31. We will be starting in LeGrand at the High School, and then traveling to Gilmas to Middle School.

Our intent is to complete the following:

1. Review of the previous ADA visit documents.
2. Walk-through review of the HS and MS (confirm compliance and noncompliance areas).
3. Create new documents/notes as needed for Tony to reference.
4. Assist Tony with any issues he is having in submitting materials from the original review.

Buffy, can we touch base this afternoon to go over the documents/tech that Tony is struggling with on his end?

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD***Education Program Consultant - School Finance******Bureau of School Business Operations******Iowa Department of Education******Grimes Office Building; 3rd Floor******400 East 14th Street******Des Moines, Iowa 50319-0146******IDOE Cell Phone: 515-402-8700******scott.dryer@iowa.gov******Summer office hours (June 2 - August 17, 2023)******Monday - Thursday******7:30 am - 5:00 pm******Friday******8:00 am - 12:00 pm***

On Tue, May 30, 2023 at 8:13 AM Dryer, Scott <scott.dryer@iowa.gov> wrote:
Good Morning,

Tony (Supt.) and I are still working on a date for a second ADA review prior to our ADA team meeting at East Marshall on June 22. Right now we are working on this Thursday. If this works in your schedule to join us SueAnn, please let me know. Due to the two campuses and a full recap of the first review, I would plan for four hours not counting any drive time.

I will confirm with everyone once Tony and I reach a date that works in both of our schedules.

Thanks,

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD

Education Program Consultant - School Finance

Bureau of School Business Operations

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SueAnn D. Johnson
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Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Department of Education

From: Campbell, Buffy <buffy.campbell@iowa.gov>

Date: Tue, Jun 20, 2023 at 10:03 AM

Subject: Facilities Accessibility review meeting reminder

To: Dryer, Scott <scott.dryer@iowa.gov>, SueAnn Johnson <sueann.johnson@iowa.gov>, Dennis McClain <dennis.mcclain@iowa.gov>, Heitz, Eric [IDOE] <eric.heitz@iowa.gov>, East Marshall [Supt] LEADistrictSuperintendents <ryan@east-marshall.k12.ia.us>

Tony, Scott, Sueann, Dennis and Eric,

Please be sure that you have our meeting this coming Thursday, June 22, from 1:30 to 3:00 on your calendar.

We will begin our meeting in LeGrand at the High School, chat about progress and plan a walk-through of the building to review any updates that have been completed. Depending on what has been finished at the middle school in Gilman, we will travel to the middle school and continue with our facilities walk-through.

Tony, if any of the items on the punch list for each building have been completed, please update the google doc.

I am including a link to the [East Marshall Equity Corrective Action Summary](#) as our reference point. Clicking on the title in blue type will open the link.

Please let me know if you have questions or need additional information.

Sincerely,

Buffy Campbell

—

Summer Hours: June 2 through August 17, 2023 - 7:00 am to 3:30 pm.

Buffy Campbell

School Improvement Consultant - Central Rivers and Keystone AEA's

Home School Contact

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

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Buffy.campbell@iowa.gov



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

June 21, 2021

Tony Ryan, Superintendent
East Marshall Community School District
201 West Center Street, Box 159
Gilman, IA 50106

Dear Superintendent Ryan:

The Iowa Department of Education would like to express appreciation for the documents submitted as part of the equity review. As you know, as a recipient of federal financial assistance, the East Marshall Community School District (EMCSD) is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (Guidelines) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. Because East Marshall High School is the only school in the district that offers CTE programs, it is the only school in EMCSD that was part of the Iowa Department of Education's review. The purpose of the review was to determine the school's compliance with the Guidelines and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Please note, this report not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

EMCSD was selected for review based on Iowa Department of Education's targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex and disability. The specific factors that led to the selection EMCSD for an equity review are as follows:

Creating excellence in education through leadership and service

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Phone (515) 281-5294 | www.educateiowa.gov

EMCSD CSD Data:

After data for the eligible universe of districts were gathered, districts were ranked based on CTE data, minority student data, recorded complaints/referrals and the number of years since the district's last equity visit. The ranks for each indicator were weighted and summed to figure a final score for each district. The ten (10) districts with the highest final scores were selected to receive a focused equity review in 2020-21. Below is a summary of EMCSD's data.

- **Indicator A:** 67.5% of EMCSD CTE classes have 80% or more of the students enrolled that are male or female.
- **Indicator B:** Variance of the % of the total students enrolled in CTE classes by sex compared to the total students enrolled in the district by sex is 34.85%.
- **Indicator C:** Variance of the % of the total students enrolled in CTE classes by race/ethnicity compared to the total students enrolled in the district by race/ethnicity is 23.51%
- **Indicator D:** Variance of the % of the total students enrolled in CTE classes by disability status compared to the total students enrolled in the district by disability status is 17.42%.
- **Indicator E:** Over the past 5 years the district has seen a 2.1% increase in the number of minority students
- **Indicator G:** EMCD has never has and equity visit.

EMCSD total score of 973 resulted in selection to receive focused equity review during the 2020-21 school year.

Letter of Findings:

This letter of findings (LOF) summarizes the Iowa Department of Education's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placements; and
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the visit. The LOF includes findings and recommendations and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue. All required corrective actions must be included in a Voluntary Compliance Plan (VCP). If applicable, a VCP template will be attached with the areas of noncompliance already entered, though you may use a different format if you

so choose. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your district will take to remedy each item, the target completion date (month and year) and a statement of how completion of the corrective action will be reported and verified to the Iowa Department of Education. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. At this point the district is not required to submit additional information. This may change based on the ADA review.

The Office for Civil Rights (OCR) requires implementation of remedies to correct areas of noncompliance be prompt, but reasonable in light of their difficulty. In the case that a remedy will take longer than a year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending.

Thank you again for your cooperation during the onsite review. Your time and effort in organizing documents for review and scheduling interviews was much appreciated. If you desire clarification of the contents of this letter, please contact Eric Heitz, School Improvement Consultant for School Improvement, Division of Learning and Results (515-281-4726). Continued technical assistance for any issue or concern that may arise within your district or any assistance needed for preparing your VCP is available through the Department of Education. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements. Thank you for your cooperation in this matter and your continued interest in ensuring that our educational programs effectively serve all our students.

Sincerely,



Janell Brandhorst, Chief
Bureau of School Improvement
Division of Learning and Results

cc: School Board President
Equity Review Team Members
Equity Review File

East Marshall Community School District

Letter of Findings



June 21, 2021

**Iowa Department of Education
Grimes State Office Building
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the board policies, the functioning of the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by EMCS D is published and contains CTE programs and all required protected classes for both programs and employment.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; and 28 C.F.R. 35.106

Summary of Findings and Analysis:

- The continuous notice provided by EMCS D is appropriately communicated contains all required protected classes for both programs and employment.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis:

- The EMCS D has appropriately designated the equity coordinator and communicated the roles and duties to staff, students and community members.

Recommendations:

- Guidance for equity coordinator role, responsibilities and functions can be found on the Iowa Department of Education website at: [2019-2020 Equity Coordinator Responsibilities Checklist](#) and [2019-2020 Role and Function of the Equity Coordinator](#)

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis:

- The EMCSD has appropriately implemented and communicated the grievance procedures.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX Section 106.31, §§ 280.28(3) and 729A.1, 281-IAC12.3(13)

Summary of Findings and Analysis:

- The EMCSD board policy number 102.R1 includes the protected classes.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

II. Recruitment, Admissions, and Counseling

This section includes equity issues related to the recruitment, admissions and counseling related to enrollment trends in CTE programs, courses and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by EMCSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented procedures to ensure access for students with limited English Language Skills.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented procedures to ensure student success.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented counseling services for students with limited English-speaking ability and hearing impairments.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Section V.A, V.C and V. E; 34 C.F.R. § 106.23

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented recruitment and promotional activities.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

- This report not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

Recommendations:

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. §106.33

Summary of Findings and Analysis:

- This report not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

Recommendations:

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education / Section 504)

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis:

- The documentation provided by EMCSD 504 indicated documents are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by EMCSD has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs and the application materials that students complete to obtain these positions.

A. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. §106.38(a)

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district is working to ensure student work place experiences are free of discrimination.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented strategies to ensure equity related to employment and personnel practices.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Salary

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by EMCSD indicated the district has appropriately implemented strategies to ensure equitable placement and advancement.

Recommendations:

- None Noted

Required Corrective Action(s):

- There are no required corrective actions at this time.


East Marshall Equity Corrective Action Summary

Equity team onsite review 6-22-23: Scott Dryer, Sueann Johnson, Dennis McClain, Buffy Campbell, Superintendent Tony Ryan.

Follow-up conversation with the Superintendent indicated that some of the work had been addressed, some was in progress - materials were on-sight and ready to be installed. Superintendent Ryan indicated that he needed a resource to purchase needed signage. Scott provided the following website as a possible resource: [AM Marketing, Inc.](#)



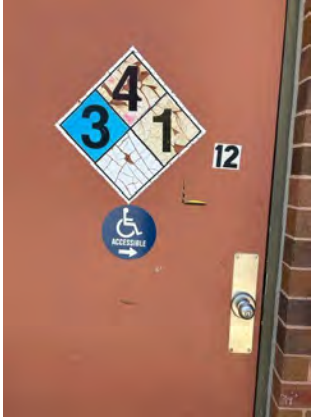
Scott and Buffy shared that next steps would include the team meeting on Friday to review information and provide feedback to Superintendent Ryan on next steps.




High School Punch List - Remaining Facility Corrective Actions


<p>Bus Loading Zone, on street</p>	<p>Post signage for accessible loading zone. May use the existing sign pole with "Drug Free Zone" sign.</p>	<p>Date Completed: Photo: July 9, 2023</p> 	
<p>Signage - restrooms in entry way commons area.</p>	<p>Signage in place, however - needs to be lowered. Bottom edge of each sign may not exceed 60 inches from the floor.</p> <p>Corrective Action 2122-1968-5 Completed 6-22-23</p>	<p>Date Completed: 6-22-23 Photo:</p>	
<p>Signage by inaccessible</p>	<p>Signage by inaccessible restrooms need signs</p>	<p>Date Completed: Photo:</p>	


restrooms directing to the nearest accessible restroom.	with arrows that point to the nearest accessible restroom. (pointing to Lobby/commons area of HS) Please photograph and upload photos.		
---	--	--	--



Middle School Punch List - Remaining Facility Corrective Actions


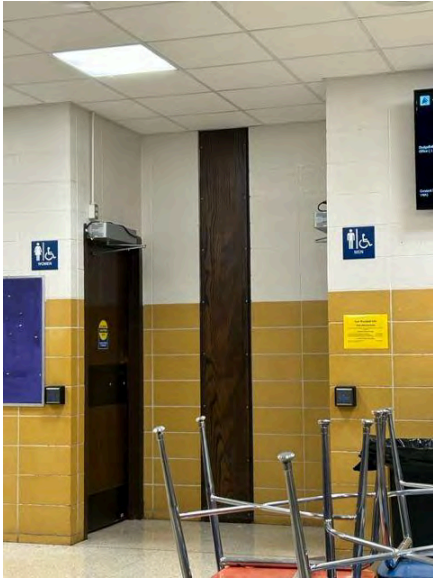
Signage designating van accessible parking	Add 2nd handicap parking sign - Van Accessible. Please photograph and upload photo.	Date Completed: Photo 	 Jul 7, 2023
<p>Entrances - Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility.</p> <p>Accessible outside entrance to the baseball concession stand area needs to have the threshold lowered to under 1/4 inch.</p>	<p>MS entrance, backside of building, outside entrance in concession stand area:</p> <ol style="list-style-type: none"> 1. Signage 2. Threshold ramp or other structural change to 1/4 high threshold <p>Please photograph and upload photo.</p> <p>Signage posted, action complete 6-22-23.</p> <p>Threshold incomplete - working with a contractor to determine best option to correct cost effectively.</p>	<p>Date completed: June 15, 2023 Photo</p> 	


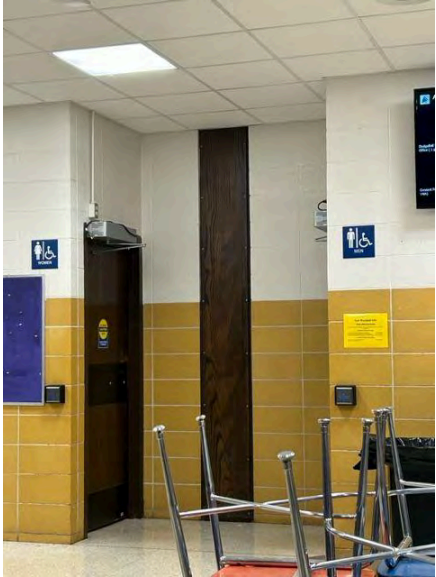
<p>Lobbies and Corridors - All functional spaces need handicap accessible signs or not accessible signs with directions to accessible paths. Restrooms need appropriate signage.</p>	<p>Post signs indicating directions to handicapped accessible facilities, and well as accessible entries. Post signs that indicate if accessible, and if not - directional sign to nearest accessible restroom.</p> <p>6-22-23: signage moved to hallway - greater visibility. This portion of action complete.</p> <p>District still needs to post directional signage on 2nd and 3rd floors indicating that the nearest accessible restroom is located on first floor.</p>	 <p>Date Completed: Finished photo:</p> 	
<p>Restrooms - The pipes under the lavatory must be insulated or covered to protect against contact in the restrooms in the accessible restrooms.</p> <p>Public restroom off gym: Remove filing cabinet to be in compliance with turnaround clearance in that restroom.</p>	<p>Check all restrooms on the first floor - ensure that pipes under sinks are wrapped.</p> <p>6-22-23: District has purchased insulation tubes, but needs to install.</p>	<p>Date Completed; Photo</p> <p>This will be addressed when our summer crew works in the middle school. Right now the crew is at the high school.</p> <p>Sample photo in far right column of wrapped pipes for reference.</p> <p>July 7, 2023</p>	



			
Shower Rooms - Accessible shower rooms must be identified by the international symbol of accessibility.	Ensure that area with multiple restrooms/shower areas are appropriately labeled based on where accessible shower, toilets are located.	Date Completed: Photo	
Cafeteria – Lower the serving window, and tray return tables/surfaces to between 28 and 34 inches from the floor, they are currently 36.5 inches from the floor.	Ensure that there is an accessible space for students with limited mobility to return lunch trays.	Date completed: Photo: As discussed on site visit, the table will be placed on the first day with students in August. This seemed to be acceptable during the site visit.	


2122-1968-2	Parking High School	<p>Parking Two of the accessible parking spaces needed shall be van accessible with a 96-inch wide access aisle and 98 inches of vertical clearance.</p> <p>A sign reading “van accessible” at van accessible spaces needs to be installed, as well as signs on all handicap accessible parking stalls.</p> <p>Standard - ADA Standard 4.1.2(5)(b); 4.6.5; 4.6.4; 4.30.7</p>	<p>Photo Documentation</p> 
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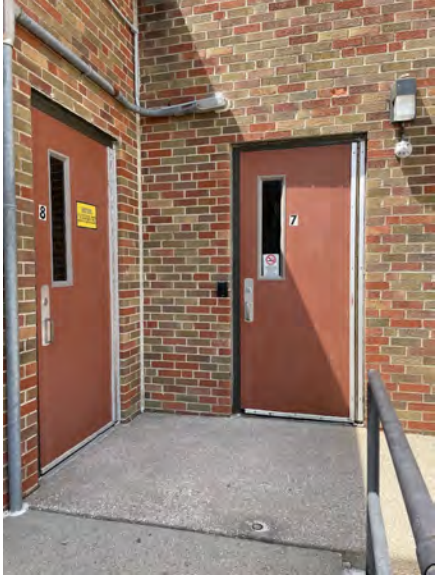

		<p>District Response - Signs will be installed to be compliant</p> <p>APPROVED - FINAL 5-31-23</p>	 <p>We are not sure if these are the parking spaces referenced, but these are directly in front of the high school office.</p>
2122-1968-3	<p>Passenger Loading Zones (High School)</p>	<p>Passenger Loading Zones – Signage with international symbol for accessibility at the accessible loading zone.</p> <p>ADA Standard - 4.1.2(7)(b)</p> <p>District Response - Signs will be added</p> <p>5-31-23: Bus loading/unloading on-street in front of HS. No Passenger Loading signage that indicates this is an accessible loading zone.</p>	
2122-1968-4	<p>Entrances (High School)</p>	<p>Entrances - Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs identified by the international symbol of accessibility.</p> <p>Standard - ADA Standard 4.1.3(8)(d); 4.30; 4.1.12(7)(c);</p> <p>District Response - Signs will be added</p> <p>APPROVED - FINAL 5-31-23</p>	<p>Photo Documentation</p> <p>Will just one photo meet the need or is there a certain number of locations that need proof?</p>

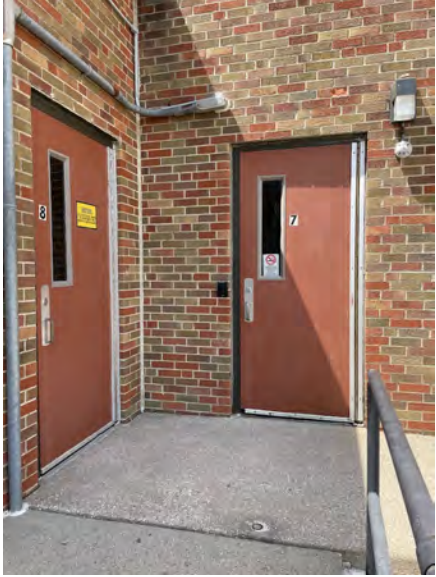

			
<p>2122-1968-5</p>	<p>Lobbies and Corridors (High School)</p>	<p>Lobbies and Corridors – All functional spaces need handicap accessible signs, or not accessible signs with directions to accessible paths.</p> <p>Restrooms need appropriate signage/directions.</p> <p>Standards - ADA Standard 4.1.3(16)(b); 4.30; 4.1.3(16)(a)</p> <p>District Response - Signs will be added</p> <p>5-31-23: Accessible signage in place.</p> <p>Need signage at inaccessible restrooms pointing to nearest accessible restroom.</p> <p>Lower signage so that the bottom edge is no more than 60 inches from the floor.</p>	<p>Photo Documentation</p> 
<p>2122-1968-6</p>	<p>Restrooms (High School - August 2023)</p>	<p>Restrooms - The hot water pipes and drain pipes under the sinks in the accessible restrooms must be insulated or configured to avoid contact with the legs of a person</p>	<p>Photo Documentation</p> <p>All pipes that we could identify have been covered. However, we were not sure of “which” bathroom, other than the 1st floor.</p>


		<p>using a wheelchair.</p> <p>Need to have at least 29 inches from the bottom edge of the lavatory to the floor. (1st Floor RR).</p> <p>Clear space of 30 to 48 inches underneath towel dispensers. Currently have garbage cans located there.</p> <p>Grab bars need to be installed in the accessible restrooms/stall.</p> <p>Standards - ADA Standard 4.19.4; 4.19.2; 4.27.2; 4.17.6; 4.26</p> <p>APPROVED - FINAL</p> <p>5-31-23: Accessible restrooms: High School - exposed pipes below sinks have been wrapped, towel dispenser access is clear.</p>	<p>Is this just one bathroom stall/room or several? We replaced one of them on 1st floor.</p> 
<p>2122-1968-7</p>	<p>Restrooms (High School - October 2022)</p>	<p>Restrooms - Accessible restrooms must be identified by the international symbol of accessibility.</p> <p>ADD - A sign at the inaccessible restrooms needs to give directions to the accessible restrooms.</p> <p>Tactile signage identifying the restrooms. On the latch side of the door, and 60 inches above the floor.</p> <p>Standards - ADA Standard 4.1.2(7)(d); 4.1.6(3)(e)(iii); 4.30; 4.1.3(16)(a)</p> <p>District Response - Signs will be added</p> <p>5-31-23: Signage in place, however - needs to be lowered. Bottom edge of each sign may not exceed 60 inches from the floor.</p>	<p>Photo Documentation</p> 
<p>Citation ID: 2122-1968-8</p>	<p>Rooms and Space (High</p>	<p>Rooms and Spaces - Signage for directions to permanent spaces, restroom signs, and exit signs</p>	<p>Photo Documentation</p>

	School)	<p>need to be comply with appropriate compliance.</p> <p>Standards - ADA Standards 4.1.3(16)(a and b); 4.30</p> <p>District Response - Signage will be added</p>	
2122-1968-9	Shower Rooms (High School)	<p>Shower Rooms – Accessible shower rooms need to be identified with the appropriate signage.</p> <p>Standard - ADA Standard 4.1.2(7)(d); 4.1.3(16)(a); 4.30</p> <p>District Response - Signage will be posted</p>	<p>Photo Documentation</p> 
2122-1968-11	Parking (Middle School)	<p>Parking - One of the required accessible 96” parking spaces shall be van accessible with a 96” wide access aisle and 98” of vertical clearance. The accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. One of the spaces must also have an additional sign "Van-Accessible" mounted below the symbol of accessibility. Such signs shall be located so they cannot be obscured by a vehicle parked in the space.</p> <p>Accessible parking spaces must be at least 96” wide and have an access aisle of 60” wide.</p> <p>Standards - ADA Standard 4.6.4; 4.30.7; 4.1.2(5)(b); 4.6.5</p> <p>District Response - Signs will be added</p>	 <p>July 7, 2023</p>

		<p>5-31-23: Add second parking sign - include VAN Accessible.</p>	
<p>2122-1968-12</p>	<p>Passenger Loading Zone (Middle School)</p>	<p>Passenger Loading Zone - Signage with international symbol for accessibility at the accessible loading zone</p> <p>Standard - ADA Standard 4.1.2(7)(b)</p> <p>District Response - Signs will be added</p>	<p>Photo Documentation</p> <p>From my understanding of the last site visit, the bus loading zone sign needed to be placed at the high school and the middle school met the minimum requirements. Please advise. - Tony Ryan</p>
<p>2122-1968-13</p>	<p>Entrances (Middle School)</p>	<p>Entrances - Inaccessible entrances need signs indicating the location of the nearest accessible entrance.</p> <p>Accessible entrances need signs</p>	<p>Photo Documentation</p>

		<p>identified by the international symbol of accessibility.</p> <p>Accessible outside entrance to the baseball concession stand area needs to have the threshold lowered to under ¼ inch.</p> <p>Standards - ADA Standards 4.1.3(8)(d); 4.30; 4.1.12(7)(c); 4.3.8; 4.5.2</p> <p>District Response - Signs will be added; the uneven areas will be beveled to be compliant</p> <p>5-13-23: Add signage with international symbol of accessibility</p> <p>Done: July 7, 2023</p>	 <p>Addressed added July 7, 2023</p> 
2122-1968-14	Lobbies and Corridors (Middle School - October 2022)	<p>Lobbies and Corridors - All functional spaces need handicap accessible signs or not accessible signs with directions to accessible paths. Restrooms need appropriate signage.</p> <p>Standards - ADA Standard 4.1.3(16)(b); 4.30; 4.1.3(16)(a)</p> <p>District Response - signs will be added</p>	<p>Photo Documentation</p> <p>I thought this was at the high school? If at the middle school, where do the signs need to be placed? - Tony Ryan</p>
2122-1968-15	Lobbies and Corridors (Middle School - August 2023)	<p>Lobbies and Corridors - Accessible outside entrance to the baseball concession stand area needs to have the threshold lowered to under ¼ inch.</p> <p>Standards - ADA Standard</p>	<p>Photo Documentation</p>

		<p>4.3.8; 4.5.2</p> <p>District Response - will address and remedy</p>	
<p>2122-1968-16</p>	<p>Rooms and Spaces (Middle School)</p>	<p>Rooms and Spaces – Signage for directions to permanent spaces, restroom signs, and exit signs need to comply with appropriate compliance.</p> <p>Standard - ADA Standard 4.1.3(16)(a and b); 4.30</p> <p>District Response - signs will be added</p>	<p>Photo Documentation</p>
<p>2122-1968-17</p>	<p>Restrooms (Middle School - October 2022)</p>	<p>Restrooms - Accessible restrooms must be identified by the international symbol of accessibility.</p> <p>Inaccessible restrooms must have directional signage to the accessible restroom.</p> <p>Standard - ADA Standard 4.1.6(3)(e)(iii); 4.30; ADA Standard 4.1.2(7)(d)</p> <p>District Response - signs will be added</p>	<p>Photo Documentation</p> 

<p>2122-1968-18</p>	<p>Restrooms (Middle School - August 2023)</p>	<p>Restrooms - The pipes under the lavatory must be insulated or covered to protect against contact in the restrooms in the accessible restrooms.</p> <p>Public restroom off gym: Remove filing cabinet to be in compliance with turnaround clearance in that restroom.</p> <p>Standard - ADA Standard 4.19.4; 4.22.3</p> <p>District Response - Will be corrected</p>	<p>Photo Documentation</p>  <p>July 7, 2023</p>
<p>2122-1968-19</p>	<p>Shower Rooms (Middle School - October 2022)</p>	<p>Shower Rooms - Accessible shower rooms must be identified by the international symbol of accessibility.</p> <p>Standard - ADA Standard 4.1.2(7)(d)</p> <p>District Response - signs will be added</p>	<p>Photo Documentation</p> <p>As indicated during the site visit, this met the need using the two different restroom and shower facility rooms across the hall from each other. - Tony Ryan</p>
<p>2122-1968-20</p>	<p>Shower Rooms (Middle School - August 2023)</p>	<p>Shower Rooms - Accessible grab bars must be installed in the accessible shower stall.</p> <p>The pipes under the lavatory must be insulated or covered to protect against contact in the restrooms in the accessible shower room.</p> <p>Seat mounted 17 to 19 inches above the shower floor on the wall opposite the shower controls, and extends the full depth of the shower.</p> <p>Standards - ADA Standard 4.19.4; 4.21.3; 4.26; 4.21.4</p>	<p>Photo Documentation</p> <p>As indicated during the site visit, this met the need using the two different restroom and shower facility rooms across the hall from each other. - Tony Ryan</p>

2122-1968-21	Cafeteria (Middle School)	<p>Cafeteria – Lower the serving window, and tray return tables/surfaces to between 28 and 34 inches from the floor, they are currently 36.5 inches from the floor.</p> <p>Standard - ADA Standard 4.32.4</p> <p>District Response - Will be corrected</p>	<p><u>Photo Documentation</u></p> <p>As mentioned above, the tray table will be placed on the first day with students. - Tony Ryan</p>
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From: **Campbell, Buffy** <buffy.campbell@iowa.gov>

Date: Sat, Jul 1, 2023 at 8:33 PM

Subject: Fwd: Equity Follow-up and support

To: Dryer, Scott <scott_dryer@iowa.gov>, SueAnn Johnson <sueann.johnson@iowa.gov>, Dennis McClain <dennis.mcclain@iowa.gov>, Heitz, Eric [IDOE] <eric.heitz@iowa.gov>, Wahlert, Tina <tina.wahlert@iowa.gov>

Hope the week went well for all - but, it's time to get back to work.

This is the email that I sent Tony Ryan, Superintendent at East Marshall on June 23, at 10:28 am. As of today (Saturday, July 1) he has not responded. I will wait until this coming Wednesday, July 5th, and will send a reminder regarding several of the questions that were included.

Do you have any thoughts or suggestions that you would like to share or that you want me to consider?

Best to all,
Buffy

----- Forwarded message -----

From: **Campbell, Buffy** <buffy.campbell@iowa.gov>

Date: Fri, Jun 23, 2023 at 10:28 AM

Subject: Equity Follow-up and support

To: East Marshall [Supt] LEADistrictSuperintendents <tryan@e-marshall.k12.ia.us>

Good morning Tony,

Thank you for taking time to meet with the team from the DE. You mentioned that you were working with a new lead custodian. Could you share his or her contact information? I would like to include them in our work on finishing the facilities updates.

I am also including a copy of the Letter of Finding and the VCP for you to share with the new custodial staff.

The team noticed that there were pipe insulation tubes in the boiler room area at the Middle School for wrapping the exposed metal plumbing pipes below the sinks in the restrooms on the first floor. The inner diameter of the insulation tubes doesn't appear to be sufficient to accommodate the diameter of the plumbing. In several of the restrooms in the high school, white PVC was used and was sufficient to meet compliance. I have inserted a photo of a compliant example in the google doc for reference. Whatever solution is deployed, it must wrap the entire pipe

Also, who will be serving as the district Equity coordinator for the coming school year. I want to be sure that if it is someone other than you, I can include them as well.

Thank you Tony.

Sincerely,
Buffy Campbell

Fwd: IDOE-CASA Update on Corrective Actions (Equity) for East Marshall CSD

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 7:48 PM

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>

Date: Fri, Jul 7, 2023 at 12:47 PM

Subject: IDOE-CASA Update on Corrective Actions (Equity) for East Marshall CSD

To: <ryan@e-marshall.k12.ia.us>

Cc: Wahlert, Tina <tina.wahlert@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>, Andrea Terrones <aterrones@e-marshall.k12.ia.us>, <ecrandon@e-marshall.k12.ia.us>, <abloom@e-marshall.k12.ia.us>, <thungerford@e-marshall.k12.ia.us>, <hthomas@e-marshall.k12.ia.us>, Dennis McClain <dennis.mcclain@iowa.gov>

Dear Superintendent Ryan,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring East Marshall Community School District's (CSD) immediate attention. As you are aware from our previous correspondence dated June 21, 2021 (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, August 4, 2023, as the previous deadlines and extensions have passed.

The Department's equity review team anticipates an in-person visit to East Marshall CSD on August 8, 2023, to review the items listed below. The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **Further Action Required**. This indicates that the required action steps have not been completed.

- 2122-1968-2 Parking (High School)
- 2122-1968-3 Passenger Loading Zones (High School)
- 2122-1968-4 Entrances (High School)
- 2122-1968-5 Lobbies and Corridors (High School)
- 2122-1968-7 Restrooms (High School - October 2022)
- 2122-1968-8 Rooms and Space (High School)
- 2122-1968-9 Shower Rooms (High School)
- 2122-1968-11 Parking (Middle School)
- 2122-1968-12 Passenger Loading Zone (Middle School)
- 2122-1968-13 Entrances (Middle School)
- 2122-1968-14 Lobbies and Corridors (Middle School - October 2022)
- 2122-1968-15 Lobbies and Corridors (Middle School - August 2023)
- 2122-1968-16 Rooms and Spaces (Middle School)
- 2122-1968-17 Restrooms (Middle School - October 2022)
- 2122-1968-18 Restrooms (Middle School - August 2023)
- 2122-1968-19 Shower Rooms (Middle School - October 2022)
- 2122-1968-20 Shower Rooms (Middle School - August 2023)
- 2122-1968-21 Cafeteria (Middle School)
- 2122-1968-6 Restrooms (High School - August 2023)

Based on the two most recent visits by the Department's equity review team on May 31 and June 22, 2023, we are aware that many of the items above have been addressed. However, we are unable to review and close the corrective actions because the requisite action steps in CASA have not been followed. Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Ryan at ryan@e-marshall.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found [here](#).

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It is also important that the Department has updated contact information for your district's Equity Coordinator. Please provide the name and contact information for the individual who has been designated to serve in this role for the upcoming school year no later than

August 4, 2023.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-336-3942
sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday
8:00 am - 4:30 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
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Iowa Department of Education
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Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Department of Education

2 attachments

 **Letter to East Marshall CSD 7.7.23.pdf**
224K

 **East Marshall LOF.pdf**
284K

Fwd: East Marshall Corrective Action Review

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:10 PM

----- Forwarded message -----

From: **Dryer, Scott** <scott.dryer@iowa.gov>

Date: Wed, Jul 12, 2023 at 9:22 AM

Subject: Re: East Marshall Corrective Action Review

To: Tony Ryan <tryan@e-marshall.k12.ia.us>, SueAnn Johnson <sueann.johnson@iowa.gov>

Tony,

I have included SueAnn Johnson in this email so we are all on the same page.

I am not sure what "tape" you are referring to from a previous document. I do believe there are products that are called "tape", but are thicker and designed to block the heat that comes off of the pipes. The tape in the picture appears to be thin tape to close the gap from the foam that does not completely enclose the pipe, and to secure the foam in place.

If we are not seeing the picture accurately, and the foam is completely enclosed around the pipe, then the tape in the picture is fine.

Hope this helps,

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD***Education Program Consultant - School Finance******Bureau of School Business Operations******Iowa Department of Education******Grimes Office Building; 3rd Floor******400 East 14th Street******Des Moines, Iowa 50319-0146******IDOE Cell Phone: 515-402-8700******scott.dryer@iowa.gov******Summer office hours (June 2 - August 17, 2023)******Monday - Thursday******7:30 am - 5:00 pm******Friday******8:00 am - 12:00 pm***

On Tue, Jul 11, 2023 at 5:41 PM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:

Scott,

We will cover the end up.

741

However, the tape and insulation is the recommendation that you prided on your early site visit. Why is the tape no longer valid?

Thank you.
Tony

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>

Date: Tue, Jul 11, 2023 at 4:35 PM

Subject: East Marshall Corrective Action Review

To: Tony Ryan <tryan@e-marshall.k12.ia.us>

Cc: Dryer, Scott <scott.dryer@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>, Dennis McClain

<dennis.mcclain@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>

Hello Tony,

I have been reviewing the corrective actions in CASA that have been updated with photographic proof of completion. Many items look good and are able to be approved. However, I wanted to reach out to you about this one in particular: 2122-1968-18 Restrooms (Middle School - August 2023). Based on the photo, it appears that the pipe has been covered in foam and tape. I am concerned that this "fix" will not adequately insulate from heat and may not last depending on what type of tape is being used. Because of this, I am unable to approve this corrective action in CASA at this point in time.

Please ensure that the pipes are **completely insulated** or that a cover is installed to adequately prevent contact. For further reference, you and/or your maintenance personnel may want to review this [ADA checklist](#) (with diagrams).

Respectfully,
SueAnn

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-336-3942

sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00 am - 4:30 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

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Anthony P. Ryan

Superintendent of Schools
East Marshall Community School District

NOTICE TO RECIPIENT: THIS MESSAGE AND ANY RESPONSE TO IT MAY CONSTITUTE A PUBLIC RECORD, AND THEREFORE, MAY BE AVAILABLE UPON REQUEST IN ACCORDANCE WITH IOWA PUBLIC RECORDS LAW, IOWA CODE CHAPTER 22.

Confidentiality Statement: This message is intended only for the use of the Addressee and may contain information that is PRIVILEGED and CONFIDENTIAL. If you have received this communication in error, please erase all copies of the message and its attachments and notify the sender immediately. Thank you.

NOTICE TO RECIPIENT: This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code chapter 22.

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Aug 7, 2023 at 3:25 PM

Subject: East Marshall Visit Tomorrow

To: Tony Ryan <tryan@e-marshall.k12.ia.us>

Cc: Dryer, Scott <scott.dryer@iowa.gov>, Dennis McClain <dennis.mcclain@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>

Tony,

This is to confirm our visit to East Marshall tomorrow morning at 9:00 am. Scott, Dennis, and I look forward to meeting with you (and any maintenance personnel, if available) to review the remaining equity noncompliance items in CASA.

Respectfully,

SueAnn

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

Phone: 515-336-3942

sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00 am - 4:30 pm

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SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov



IOWA

Department of Education

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

August 17, 2023

Tony Ryan
Superintendent
East Marshall Community School District
204 West Center Street, Box 159
Gilman, IA 50106

Dear Superintendent Ryan,

This letter is in reference to previous correspondence to the East Marshall Community School District (CSD) from the Iowa Department of Education (Department), dated July 7, 2023 (see attached), outlining nineteen outstanding corrective actions for areas of equity noncompliance at the East Marshall Community School District's (CSD) middle and high school.

On August 8, 2023, members of the Department's equity review team visited East Marshall Community School District (CSD) in person to review and confirm completion of several tasks relating to the aforementioned corrective actions. As of the date of this letter, the Department's Consolidated Accountability and Support Application (CASA) corrective action dashboard shows six corrective actions remain outstanding and require your district's immediate attention. These issues were originally brought to your attention in a Letter of Finding (LOF), dated June 21, 2021 (see attached), following an on-site equity review in spring 2021.

As you are already aware, it is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item immediately, as all previous deadlines and extensions have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **Further Action Required**. This indicates that the required action steps have not been completed.

- 2122-1968-13 Entrances (Middle School)
- 2122-1968-14 Lobbies and Corridors (Middle School - October 2022)
- 2122-1968-16 Rooms and Spaces (Middle School)
- 2122-1968-17 Restrooms (Middle School - October 2022)
- 2122-1968-15 Lobbies and Corridors (Middle School - August 2023)
- 2122-1968-21 Cafeteria (Middle School)

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The Department is unable to close the corrective actions until all requisite action steps outlined in CASA have been followed, including uploading photographic proof of completion. After all steps have been completed, update the status in CASA for each corrective action by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Ryan at ryan@e-marshall.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

It is also important that the Department has updated contact information for your district's designated Equity Coordinator (one or more individuals). Please provide updated contact information for your district's designated Equity Coordinator (one or more individuals) as soon as possible. This task can be completed in the Assurances 2023-24 (Public) data collection located in the "Assurances" folder in CASA. Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,

Tina Wahlert

Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: 515-326-0162
Email: Tina.Wahlert@iowa.gov

cc: Andrea Terrones, East Marshall CSD School Board President
Elizabeth Crandon, East Marshall CSD School Board Vice President
AnnDee Bloom, East Marshall CSD School Board Member
Terri Hungerford, East Marshall CSD School Board Member
Holly Thomas, East Marshall CSD School Board Member
SueAnn Johnson, Administrative Consultant, Equity Compliance – School Improvement
Eric Heitz, Administrative Consultant – School Improvement
Buffy Campbell, School Improvement Consultant – Central Rivers and Keystone AEAs
Dennis McClain, School Improvement Consultant – Central Rivers and Keystone AEAs
Scott Dreyer, School Finance Consultant – School Business Operations

Fwd: Equity Noncompliance

2 messages

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 7:41 PM

Please save the entire email chain and attachments for this one.

----- Forwarded message -----

From: **Wahlert, Tina** <tina.wahlert@iowa.gov>

Date: Fri, Aug 18, 2023 at 1:16 PM

Subject: Equity Noncompliance

To: <tryan@e-marshall.k12.ia.us>

Cc: SueAnn Johnson <sueann.johnson@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Campbell, Buffy <buffy.campbell@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>, <aterrones@e-marshall.k12.ia.us>, <ecrandon@e-marshall.k12.ia.us>, <abloom@e-marshall.k12.ia.us>, <thungerford@e-marshall.k12.ia.us>, <hthomas@e-marshall.k12.ia.us>, Dennis McClain <dennis.mcclain@iowa.gov>

Dear Superintendent Ryan,

This letter is in reference to previous correspondence to the East Marshall Community School District (CSD) from the Iowa Department of Education (Department), dated July 7, 2023, outlining nineteen outstanding corrective actions for areas of equity noncompliance at the East Marshall Community School District's (CSD) middle and high school.

On August 8, 2023, members of the Department's equity review team visited East Marshall Community School District (CSD) in person to review and confirm completion of several tasks relating to the aforementioned corrective actions. As of the date of this letter, the Department's Consolidated Accountability and Support Application (CASA) corrective action dashboard shows **six corrective actions remain outstanding and require your district's immediate attention**. These issues were originally brought to your attention in a Letter of Finding (LOF), dated June 21, 2021 (see attached), following an on-site equity review in spring 2021.

As you are already aware, it is critically important that these items are addressed to bring your district and the Department into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. **Please see the information below and take the steps outlined to address each item immediately, as all previous deadlines and extensions have passed.**

The current status of the following corrective actions (equity) in CASA is Action Overdue or Further Action Required. This indicates that the required action steps have not been completed.

- . 2122-1968-13 Entrances (Middle School)
- 2122-1968-14 Lobbies and Corridors (Middle School - October 2022)
- 2122-1968-16 Rooms and Spaces (Middle School)
- 2122-1968-17 Restrooms (Middle School - October 2022)
- 2122-1968-15 Lobbies and Corridors (Middle School - August 2023)
- 2122-1968-21 Cafeteria (Middle School)

The Department is unable to close the corrective actions until all requisite action steps outlined in CASA have been followed, including uploading photographic proof of completion. After all steps have been completed, update the status in CASA for each corrective action by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Ryan at tryan@e-marshall.k12.ia.us. The corrective action will then be closed in CASA.

More information about the process for addressing a citation in CASA can be found at:

<https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

It is also important that the Department has updated contact information for your district's designated Equity Coordinator (one or more individuals). Please provide updated contact

information for your district's designated Equity Coordinator (one or more individuals) as soon as possible. This task can be completed in the Assurances 2023-24 (Public) data collection located in the "Assurances" folder in CASA. Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov. Thank you for your commitment to making your school district an accessible and welcoming environment for all.

Sincerely,

Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education

cc: Andrea Terrones, East Marshall CSD School Board President
Elizabeth Crandon, East Marshall CSD School Board Vice President
AnnDee Bloom, East Marshall CSD School Board Member
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SueAnn Johnson, Administrative Consultant, Equity Compliance – School Improvement
Eric Heitz, Administrative Consultant – School Improvement
Buffy Campbell, School Improvement Consultant – Central Rivers and Keystone AEAs
Dennis McClain, School Improvement Consultant – Central Rivers and Keystone AEAs
Scott Dreyer, School Finance Consultant – School Business Operations

--
Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

Regular office hours:

Monday - Friday
7:30 am - 4:00 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



2 attachments

 **Letter to East Marshall CSD 8.17.23.pdf**
96K

 **East Marshall LOF.pdf**
284K

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>

Date: Mon, Aug 28, 2023 at 3:01 PM

Subject: Re: Equity Noncompliance

To: Tony Ryan <tryan@e-marshall.k12.ia.us>, Dennis McClain <dennis.mcclain@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>

Cc: Wahlert, Tina <tina.wahlert@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>

Tony,

All corrective actions have been completed and closed in CASA! Thank you for your efforts to ensure accessibility for all in your district.

Please feel free to contact me if you have any questions or concerns about equity-related matters in the future.

Respectfully,
SueAnn

On Mon, Aug 28, 2023 at 2:52 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Thank you, Tony. I will add this to the notes and should be able to close out the action right away.

SueAnn

On Mon, Aug 28, 2023 at 2:47 PM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:

77 inches

On Mon, Aug 28, 2023 at 2:46 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Tony,

The first photo is a bit blurry on my monitor and I cannot read the numbers. I cannot tell what the second photo is measuring. What is the width of the incline (without the downward slope)?

SueAnn

On Mon, Aug 28, 2023 at 2:43 PM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:

SueAnn,

Is the attached the measure you are looking for?

Thanks,
Tony

On Mon, Aug 28, 2023 at 2:21 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Tony,

My reading of the ADA Checklist that we referenced during our earlier visits to East Marshall is that for every inch of height change there must be at least 20 inches of route run (see p. 7). So, the running slope would need to be 50 inches. The width must be 36 inches. However, I ran this by Scott for his input, and he noted that rises that are no greater than 3 inches with a slope no steeper than 1:8 are permitted when such slopes are necessary due to space limitations. Additionally, no need for railings since the rise is not greater than 6 inches.

Please confirm the width of the incline is ADA compliant whenever you have a moment. Thanks!

SueAnn

On Tue, Aug 22, 2023 at 9:23 AM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:

SueAnn,

The rise is 2.5 inches and the run is 45 inches. According to my understanding, the 45 inch run would allow for a height up to 3.75 inches. Our measure is below 3.75 inches, so we should be okay.

Thank you.
Tony

On Mon, Aug 21, 2023 at 11:51 AM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Tony,

I am reviewing these today and will reply with any additional notes or corrections, as they arise. One citation (Citation ID: 2122-1968-16) was accidentally placed back in your queue, not exactly sure what happened in CASA. But please submit it as ready for review again, and I will make sure to close it out as all required photos have been attached.

Thank you,
SueAnn

On Fri, Aug 18, 2023 at 7:41 PM Wahlert, Tina <tina.wahlert@iowa.gov> wrote:

Thank you very much for the update, Tony. Our team will review your submission as soon as possible.

All the best,

Tina

On Fri, Aug 18, 2023 at 7:38 PM Tony Ryan <tryan@e-marshall.k12.ia.us> wrote:

Tina,

All of the CASA reports are updated with the data necessary to be reviewed. We believe we have met all of the criteria and guidance from the last visit. At this time, we are waiting for the CASA report to be reviewed and closed.

The report identifying the Equity Coordinator was filled out a few days ago. If there is another report that needs to be filled out, please advise.

Regards,
Tony

[Quoted text hidden]

Anthony P. Ryan

Superintendent of Schools
East Marshall Community School District

NOTICE TO RECIPIENT: THIS MESSAGE AND ANY RESPONSE TO IT MAY CONSTITUTE A PUBLIC RECORD, AND THEREFORE, MAY BE AVAILABLE UPON REQUEST IN ACCORDANCE WITH IOWA PUBLIC RECORDS LAW, IOWA CODE CHAPTER 22.

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Tina Wahlert
Bureau Chief, School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-326-0162
tina.wahlert@iowa.gov

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SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-336-3942
sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00 am - 4:30 pm

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Anthony P. Ryan

Superintendent of Schools

East Marshall Community School District

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SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

Phone: 515-336-3942

sueann.johnson@iowa.gov

Regular office hours:

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8:00 am - 4:30 pm

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Superintendent of Schools

East Marshall Community School District

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[Quoted text hidden]

Linn-Marr Community School District

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Thu, Jun 1, 2023 at 11:02 AM

Subject: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

To: <andy.parke@linnmar.k12.ia.us>

Andy Parke,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows multiple items requiring Linn-Mar CSD's attention. Please see the information below and take the steps outlined to address each item.

The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **Further Action Required**.

- Citation ID: 2122-3715-6 - Entrances
- Citation ID: 2122-3715-7 - Lobbies and Corridors
- Citation ID: 2122-3715-2 - Parking (High School)

For each of the above, photos have been submitted to show completion of the required action steps, and no further documentation is needed. Please update the status in CASA for each citation by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to andy.parke@linnmar.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at this [link](#).

The current status of the following corrective action (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed. Please complete all action steps as outlined in CASA and upload photographic proof of completion immediately, as the due date has passed.

- Citation ID: 2122-3715-8 - Restrooms

Restrooms – Some of the restrooms are accessible and some of them are not at the high school and Excelsior MS. Accessible restrooms must be identified by the international symbol of accessibility and the inaccessible restrooms must have directional signage to the accessible toilet room.

In addition, all hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair. At the high school and Excelsior MS, there are hot water pipes and drain pipes not insulated. The district shall insulate all the necessary pipes:

Standards - ADA Standards 4.1.2(7)(d); 4.1.6(3)(e)(iii); 4.30; 4.19.4

Districts - Add the necessary signage to all restrooms that are not ADA compliant to giving direction to restrooms that are ADA compliant. Ensure that all ADA restrooms are properly labeled with the correct signage. Insulate all drainpipes as required for ADA compliance at both Excelsior MS and the High School.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn

Fwd: FW: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:31 PM

----- Forwarded message -----

From: **David Nicholson** <david.nicholson@linnmar.k12.ia.us>

Date: Thu, Aug 31, 2023 at 11:24 AM

Subject: RE: FW: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

To: Johnson, SueAnn <sueann.johnson@iowa.gov>

Cc: Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>, Andy Parke <andy.parke@linnmar.k12.ia.us>

Thank you so much!

Dave

David Nicholson

Chief Financial/Operating Officer

Linn-Mar Community School District

2999 N. 10th St Marion, IA 52302

Phone: 319-447-3008

From: Johnson, SueAnn <sueann.johnson@iowa.gov>**Sent:** Thursday, August 31, 2023 8:38 AM**To:** David Nicholson <david.nicholson@linnmar.k12.ia.us>**Cc:** Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>; Andy Parke <andy.parke@linnmar.k12.ia.us>**Subject:** Re: FW: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

Thank you for taking care of that. This action has been closed in CASA.

Have a great school year!

SueAnn

On Thu, Aug 31, 2023 at 8:16 AM David Nicholson <david.nicholson@linnmar.k12.ia.us> wrote:

SueAnn,

The bookshelves have been moved and the photo has been uploaded to CASA.

Dave

David Nicholson

Chief Financial/Operating Officer

Linn-Mar Community School District

2999 N. 10th St Marion, IA 52302

Phone: 319-447-3008

From: David Nicholson
Sent: Monday, August 28, 2023 3:19 PM
To: Andy Parke <andy.parke@linnmar.k12.ia.us>
Cc: Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>
Subject: FW: FW: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

Andy,

Were you able to locate the rest room with the bookshelves? I need the picture of them being removed.

Dave

David Nicholson

Chief Financial/Operating Officer

Linn-Mar Community School District

2999 N. 10th St Marion, IA 52302

Phone: 319-447-3008

From: Johnson, SueAnn <sueann.johnson@iowa.gov>
Sent: Monday, August 28, 2023 2:31 PM
To: David Nicholson <david.nicholson@linnmar.k12.ia.us>
Cc: Andy Parke <andy.parke@linnmar.k12.ia.us>; Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>
Subject: Re: FW: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

Amy and Dave,

Just wanted to follow up with you on this since I'm not seeing any updates in CASA. Once the bookshelves have been moved, please upload a photo as proof and change the status. Then, I will be able to close out the action. Thanks!

SueAnn

On Mon, Aug 21, 2023 at 5:31 PM David Nicholson <david.nicholson@linnmar.k12.ia.us> wrote:

See the email below. We need to move the bookshelves.

Dave

From: Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>
Sent: Monday, August 21, 2023 4:16 PM
To: Johnson, SueAnn <sueann.johnson@iowa.gov>
Cc: David Nicholson <david.nicholson@linnmar.k12.ia.us>; Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>
Subject: Re: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

Thank you, SueAnn. I will have Dave and team take a look at this again.

Amy Kortemeyer

Superintendent of Schools

Linn-Mar Community School District

2999 N. Tenth Street, Marion, Iowa 52302

Phone: 319-447-3001

Email: amy.kortemeyer@linnmar.k12.ia.us



From: Johnson, SueAnn <sueann.johnson@iowa.gov>
Sent: Monday, August 21, 2023 3:34 PM
To: Amy Kortemeyer <amy.kortemeyer@linnmar.k12.ia.us>
Subject: Re: IDOE-CASA Update on Corrective Actions (Equity) for Linn-Mar CSD

Amy,

While reviewing corrective actions in CASA, I noticed that in one of the photos that was submitted for Citation ID: 2122-3715-8, a couple of bookshelves are placed underneath the accessible restroom signage. As this could potentially impede a person using a cane or other sight impaired person from accessing the braille signs, they should be removed from this location. Once this is done, please upload photographic proof in CASA and I will then be able to close this corrective action.

Please contact me with any questions. Thank you.

SueAnn

On Wed, Jul 12, 2023 at 9:22 AM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Amy Kortemeyer,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows multiple items requiring Linn-Mar CSD's attention. Please see the information below and take the steps outlined to address each item.

The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **Further Action Required**.

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- Citation ID: 2122-3715-2 - Parking (High School)

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Restrooms – Some of the restrooms are accessible and some of them are not at the high school and Excelsior MS. Accessible restrooms must be identified by the international symbol of accessibility and the inaccessible restrooms must have directional signage to the accessible toilet room.

In addition, all hot water pipes and drain pipes must be insulated, or configured to avoid contact with the legs of a person using a wheelchair. At the high school and Excelsior MS, there are hot water pipes and drain pipes not insulated. The district shall insulate all the necessary pipes.

Standards - ADA Standards 4.1.2(7)(d); 4.1.6(3)(e)(iii); 4.30; 4.19.4

Districts - Add the necessary signage to all restrooms that are not ADA compliant to giving direction to restrooms that are ADA compliant. Ensure that all ADA restrooms are properly labeled with the correct signage. Insulate all drainpipes as required for ADA compliance at both Excelsior MS and the High School.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

Phone: 515-336-3942

sueann.johnson@iowa.gov

Monday - Friday

8:00 am - 4:30 pm

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SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319

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sueann.johnson@iowa.gov

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Bureau of School Improvement

Iowa Department of Education

Grimes State Office Building

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Email: sueann.johnson@iowa.gov

Website: <https://educateiowa.gov/>



Department of Education

Moulton-Udell Community School District



IOWA

Department of Education

Ann Lebo, Director

Adam Gregg, Lt. Governor

Kim Reynolds, Governor

**ATTACHMENT A
AREAS OF NONCOMPLIANCE
VOLUNTARY COMPLIANCE PLAN (VCP)
Moulton-Udell Community School District**

Required Corrective Action	ADA Standard(s)	Specific remedies to correct	Evidence needed to verify remedy	Staff member(s) responsible	Timeline for completion
<p>II B. Access for National Origin Minority Students with Limited English Language Skills in the Course Description Guide. Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented.</p>	US OCR Guidelines Section IV.L	Moulton-Udell CSD will provide documentation in course and program descriptions and ensure that they are available for students with limited English Language skills.	<p>Evidence <u>must</u> include:</p> <p>Course descriptions available to students and prospective students, including limited English-speaking students, prior to and during registration</p>	Shane Brown, Principal	12/31/22
<p>II D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments Counseling services are provided to all students.</p>	US OCR Guidelines Section V.D; 34; C.F.R. 100.3(a) and (b) and 104.37(b)	The Moulton-Udell CSD will provide updated documentation regarding procedures to ensure students of limited English-Speaking Ability and/or Hearing Impairments benefit from counseling services.	<p>Evidence <u>must</u> include:</p> <p>Procedures to ensure students of limited English-Speaking Ability benefit from counseling services.</p> <p>Procedures to ensure students with hearing</p>	Shane Brown, Principal	12/31/22

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			impairments benefit from counseling services.		
III. Services for Students with Disabilities Section 504 Policies and Procedures and/or Manual.	US OCR Guidelines Sections IV.N and VI.A; 34 C.F.R. §§ 104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130	Moulton-Udell CSD will provide documentation regarding section 504 policies and procedures.	Evidence <u>may</u> include: Board Policy (IASB Sample Policy #102 series Section 504 Procedure Manual and/or forms Staff Handbook	Shane Brown, Principal	12/31/22
6 A. Employment Documentation of employment practices including screening/hiring policies and procedures.	US OCR Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61	Moulton-Udell CSD will provide updated documentation regarding employment practices, policies, and procedures.	Evidence <u>must</u> include: Samples of job postings over the past three years. Employment application forms for licensed and unlicensed staff Personnel Hiring Manual Policy for equal employment opportunity IASB Sample Policy 401.1 (last updated 2016)	Shane Brown, Principal	12/31/22
III. Accessibility for Students with Disabilities				Name, Title	Month, Year
Written Plan For facilities or parts of facilities that were constructed or altered before June 4, 1977, programs must be readily accessible. The school district is required to have a written plan that describes how the programs and services in the pre-1977 portions of the high	Programs within facility must be readily accessible			Dan Maeder, Superintendent	Dec, 2022

<p>school that are inaccessible are made available to students, staff, parents, and community members with disabilities.</p>					
<p>Parking The high school building does not have the required number of accessible parking spaces and the required number of “Van-Accessible” parking space(s).</p> <p>Based on the total number of parking spaces, three of these spaces need to be designated as accessible parking spaces and currently there are only two. In addition, there is no space marked with a “Van Accessible” sign. The current location of the accessible parking spaces also does not meet ADA Standard 502.4.</p> <p>The accessible parking spaces are on a slope that is steeper than 1:50. The district will need to relocate the accessible parking spaces to comply with ADA Standard 502.4.</p> <p>Discussion took place on where the most appropriate place would be to relocate the parking spaces. If the district relocates the spaces to the south part of the parking area, a curb ramp will need to be added, including a walkway edge with a detectable warning surface. (ADAAG 4.6.6 and 4.29.5)</p>	<p>ADA Standards 208.3.1; 208.2; 502.2; 502.3; 215; 502.4</p>			<p>Dan Roberts</p>	<p>Aug, 2023</p>

<p>Entrances – All entrances to the building are not accessible. The district needs to identify the accessible entrance (Main entrance on the west side of the building) by the international symbol of accessibility.</p> <p>For all other inaccessible entrances, the district needs to include directional signage to indicate the route to the nearest accessible entrance.</p>	<p>ADA Standards 4.1.2(7)(c); 4.30</p>			<p>Dan Roberts, Operations & Maintenance Mgr</p>	<p>Aug, 2023</p>
<p>Restrooms – The restroom that is available to the public is on an accessible route and fully accessible and is identified by the international symbol of accessibility. However, where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space to the latch sides of the door, signs shall be placed on the nearest adjacent wall. Mount height shall be 60 inches above the finished floor to the centerline of the sign. The district will need to lower the sign to meet the 60 inches above the finished floor requirement.</p>	<p>ADA Standards 4.1.2(7)(d); 4.30.6</p>			<p>Dan Roberts, Operations & Maintenance Mgr</p>	<p>Aug, 2023</p>



Signature of Superintendent

11/4/22

Date

Fwd: IDOE-CASA Update on Corrective Actions (Equity) for Moulton-Udell CSD

2 messages

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 5:06 PM

Zach-

I would like to include this whole email chain in the MOA biennial report. Please create a new folder for "Pre-2022 Corrective Action Monitoring" and a subfolder for Moulton-Udell. There will be a few other subfolders, as well. Will send docs for those shortly.

Thanks again for all your help!

SueAnn

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>
Date: Thu, Jun 1, 2023 at 11:28 AM
Subject: IDOE-CASA Update on Corrective Actions (Equity) for Moulton-Udell CSD
To: <dan.roberts@dcmustangs.com>, <dan.maeder@dcmustangs.com>

Dan Maeder and/or Dan Roberts,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows one item requiring Moulton-Udell CSD's immediate attention. Please see the information below and take the steps outlined to address each item.

The current status of the following corrective action (equity) in CASA is **Action Overdue**. This indicates that the required action steps have not been completed. Please complete all action steps as outlined in CASA and upload photographic proof of completion immediately, as the due date has passed. More information about the process for addressing a citation in CASA can be found at this [link](#).

- Citation ID: 2223-4518-5 - Accessibility Plan

A written transition plan must be developed to address the accessibility concerns and compliance issues. For the accessibility transition plan, the district must:

1. Describe in detail the methods that will be used to make the facilities and/or programs accessible and,
2. Specify the schedule for taking steps necessary to achieve full program accessibility. If the time period is longer than one year, identify the steps that will be taken during each year of the transition period and indicate the person responsible for implementation of the plan.

The current status of the following corrective actions (equity) in CASA is **In Progress**. This indicates that the required action steps still need to be completed. Please complete all action steps as outlined in CASA and upload photographic proof of completion prior to the due date of August 31, 2023.

- Citation ID: 2223-4518-6 - Accessibility, Parking

Provide evidence the issues below have been completed or provide a written transition plan to address the accessibility concerns and compliance issues for the following:

1. Designate 3 parking spaces, one designated for van accessibility with appropriate signage.
2. Relocate the accessible parking spaces to comply with ADA Standard 502.4.
3. Relocate the spaces to the south part of the parking area, install a curb ramp, including a walkway edge with a detectable warning surface.

- Citation ID: 2223-4518-7 - Accessibility, Restrooms

Provide evidence the issues below have been completed or provide a written transition plan to address the accessibility concerns and compliance issues for the following:

1. Where permanent identification is provided for rooms and spaces, signs shall be installed on the wall adjacent to the latch side of the door. Where there is no wall space to the latch sides of the door, signs shall be placed on the nearest adjacent

wall. Mount height shall be 60 inches above the finished floor to the centerline of the sign. The district will need to lower the sign to meet the 60 inches above the finished floor requirement.

- Citation ID: 2223-4518-8 - Accessibility, Entrances

Provide evidence the issues below have been completed or provide a written transition plan to address the accessibility concerns and compliance issues for the following:

1. Identify the accessible entrance (west side of the building) by the international symbol of accessibility.
2. Include directional signage to indicate the route to the nearest accessible entrance.

Thank you for your prompt attention to the above. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: 515-336-3942

sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00 am - 4:30 pm

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
Bureau of School Improvement
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Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Department of Education

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:52 PM

----- Forwarded message -----

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Tue, Oct 24, 2023 at 4:44 PM

Subject: Re: IDOE-CASA Update on Corrective Actions (Equity) for Moulton-Udell CSD

To: Dan Maeder <Dan.Maeder@dcmustangs.com>

Hello Dan,

Just wanted to follow up with you about Citation ID: 2223-4518-5, which is currently overdue. I have reviewed your note with the adjusted timeline. Please upload photo proof of completion for the items outlined in the note and update the status to "ready for review," as soon as possible. Please let me know if you have any questions. Thank you!

766

SueAnn

On Mon, Sep 18, 2023 at 3:29 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Thank you for the update, Dan. You will see the CASA update letter shortly. Just wanted to let you know that I extended the deadline to Oct. 6th. Hopefully, that will give you enough time to complete the actions and upload the necessary photographic proof. I appreciate you keeping me in the loop about the steps you are taking to address these issues. Please do not hesitate to contact me if you have any questions going forward.

Respectfully,
SueAnn

On Wed, Sep 13, 2023 at 4:40 PM Dan Maeder <Dan.Maeder@dcmustangs.com> wrote:

Correction. There are a few tasks we're waiting on a contractor to complete that will be finished by October 2nd. I updated the plan with an explanation in CASA.

Thanks,
Dan

On Wed, Sep 13, 2023 at 4:25 PM Dan Maeder <Dan.Maeder@dcmustangs.com> wrote:

No worries. You're doing your job. I won't be able to get photos on CASA before next Tuesday. We've met all the requirements, again with the exception of the plan I was supposed to submit. We actually exceeded expectations and are in the process of installing a new handicapped entrance that will better accommodate folks.

As I said earlier, board members received my response to you blind copied. Thanks for the offer to hold off the letter until Friday. I simply can't meet that deadline with pictures and completely understand if you need to contact them. I'm the one who didn't complete the requirement and I take full responsibility for that.

Take care,
Dan

On Wed, Sep 13, 2023 at 4:09 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Thanks, Dan. I appreciate the quick reply. I can hold off on the letter until Friday, if you can have the photographic proof uploaded into CASA by then.

SueAnn

On Wed, Sep 13, 2023 at 3:59 PM Dan Maeder <Dan.Maeder@dcmustangs.com> wrote:

Good afternoon SueAnn,

This is completely my fault. I'll complete the corrective action listed above right away. All of the required, minus the action plan, have either been completed or are being completed as we speak. I have blind copied each of the board members this message. Here are their names and email addresses.

Moulton-Udell Board Members:

Rex Harris, Board President rex.harris@moulton-udell.org

Dustin Harris, Board Vice President dustin.harris@moulton-udell.org

Whitney Ballanger, Board Member whitney.ballanger@moulton-udell.org

Tiffany Muszynski, Board Member tiffany.muszynski@moulton-udell.org

Mark Mendick, Board Member mark.mendick@moulton-udell.org

Sincerely,
Dan

On Wed, Sep 13, 2023 at 2:14 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Hello,

I am reaching out to follow up on the above mentioned corrective actions, which are now overdue. At your earliest opportunity, please provide me with a complete list of the Moulton-Udell CSD's school board members and their email addresses, so I can send correspondence regarding the same to you and your district's school board this week. Thank you.

Respectfully,
SueAnn

[Quoted text hidden]

[Quoted text hidden]

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Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00am - 4:30pm



This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--

Dan Maeder, Shared Superintendent

Davis County CSD
608 S. Washington
Bloomfield, IA 52537
Phone: (641)664-2200
Fax: (641)664-2221

Moulton-Udell CSD
305 E 8th St
Moulton, IA 52572
Phone: (641)642-8131
Fac: (641)642-3461

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--

SueAnn D. Johnson
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Department of Education

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[Quoted text hidden]



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

June 23, 2021

Dan Maeder, Superintendent
Moulton-Udell Community School District
305 East 8th
Moulton, IA 52572

Dear Superintendent Maeder:

Moulton-Udell Community School District was selected by the Office of Civil Rights for an Equity Desk Audit review for the 2020-2021 school year. The Iowa Department of Education would like to express appreciation for the documents submitted as part of the equity review. As a recipient of federal financial assistance, the Moulton-Udell Community School District is required to comply with federal and state laws and regulations that prohibit discrimination on the basis of race, color, national origin, sex and disability. The *Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap in Vocational Education Programs* (34 C.F.R. Part 100, Appendix B) (Guidelines) require each state agency responsible for the administration of career and technical education (CTE) programs to conduct compliance reviews of subrecipients that offer CTE programs and that receive federal financial assistance from the U.S. Department of Education. Because Moulton-Udell High School is the only school in the district that offers CTE programs, it is the only school in Moulton-Udell Community School District that was part of the Iowa Department of Education's review. The purpose of the review was to determine the school's compliance with the Guidelines and the following federal laws and regulations:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin;
- Title IX of the Education Amendments of 1972 and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex;
- Section 504 of the Rehabilitation Act of 1973 and its implementing regulations at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability; and
- Title II of the Americans with Disabilities Act of 1990 and its implementing regulations at 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability.

Please note, this report does not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

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Moulton-Udell Community School District was selected for review based on Iowa Department of Education's targeting plan, which requires review of subrecipients with the highest disparities between their total enrollment and their CTE enrollment on the bases of race, sex and disability. The specific factors that led to the selection for an equity review are as follows:

Moulton-Udell Community School District Data:

After data for the eligible universe of districts were gathered, districts were ranked based on CTE data, minority student data, recorded complaints/referrals and the number of years since the district's last equity visit. The ranks for each indicator were weighted and summed to figure a final score for each district. The ten (10) districts with the highest final scores were selected to receive a focused equity review in 2020-21. Below is a summary of Moulton-Udell Community School District's data.

- **Indicator A:** 76.31% of Moulton-Udell Community School District CTE classes have 80% or more of the students enrolled that are male or female.
- **Indicator B:** Variance of the % of the total students enrolled in CTE classes by sex compared to the total students enrolled in the district by sex is 39.96%.
- **Indicator C:** Variance of the % of the total students enrolled in CTE classes by race/ethnicity compared to the total students enrolled in the district by race/ethnicity is 7.44%
- **Indicator D:** Variance of the % of the total students enrolled in CTE classes by disability status compared to the total students enrolled in the district by disability status is 20.04%.
- **Indicator E:** Over the past 5 years the district has seen a 2.74% increase in the number of minority students
- **Indicator G:** Moulton-Udell Community School District's last Equity visit was 26 years ago.

Moulton-Udell Community School District's total score of 892.5 resulted in selection to receive a focused equity visit during the 2020-21 school year.

Letter of Findings:

This letter of findings (LOF) summarizes the Iowa Department of Education's findings in the following eight major areas of review:

- I. Administrative Requirements;
- II. Recruitment, Admissions and Counseling;
- III. Accessibility;
- IV. Comparable Facilities;
- V. Services for Students with Disabilities;
- VI. Financial Assistance;
- VII. Work-study, Cooperative Programs, and Job Placements; and
- VIII. Employment

The primary purpose of this LOF is to set forth the findings of the visit. The LOF includes findings and recommendations and any areas of noncompliance for which corrective action is required. The review for compliance with state law is included for convenience and not as a part of the federal requirements that form the basis for conducting the on-site review. Legal citations are included where compliance is an issue. All required corrective actions must be included in a Voluntary Compliance Plan (VCP). If applicable, a VCP template will be attached

with the areas of noncompliance already entered, though you may use a different format if you so choose. At a minimum, your VCP should address every item of noncompliance, describe the corrective action that your district will take to remedy each item, the target completion date (month and year) and a statement of how completion of the corrective action will be reported and verified to the Iowa Department of Education. In addition, for each item, please identify the individual(s) responsible for completing the corrective action. At this point the district is not required to submit additional information. This may change based on the ADA review.

The Office for Civil Rights (OCR) requires implementation of remedies to correct areas of noncompliance be prompt, but reasonable in light of their difficulty. In the case that a remedy will take longer than a year to complete, the VCP should include a plan for interim measures to address the violation while the long-term remedy is pending.

Thank you again for your cooperation during the onsite review. Your time and effort in organizing documents for review and scheduling interviews was much appreciated. If you desire clarification of the contents of this letter, please contact Sara Nickel, School Improvement Consultant for School Improvement, Division of Learning and Results (515-971-7558). Continued technical assistance for any issue or concern that may arise within your district or any assistance needed for preparing your VCP is available through the Department of Education. Please be advised that your district has a continuing obligation to maintain compliance with all civil rights requirements. Thank you for your cooperation in this matter and your continued interest in ensuring that our educational programs effectively serve all our students.

Sincerely,



Janell Brandhorst, Chief
Bureau of School Improvement
Division of Learning and Results

cc: School Board President
Equity Review Team Members
Equity Review File

Moulton-Udell Community School District

Letter of Findings



June 23, 2021

**Iowa Department of Education
Grimes State Office Building
Des Moines, Iowa 50319-0146**

I. Administrative Requirements

This section includes issues related to the board policies, the functioning of the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §100.6(d)

Summary of Findings and Analysis:

- The annual notice provided by Moulton-Udell CSD is published and contains CTE programs and all required protected classes for both programs and employment.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; and 28 C.F.R. 35.106

Summary of Findings and Analysis:

- The continuous notice provided by Moulton-Udell CSD is appropriately communicated and contains all required protected classes for both programs and employment.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines* Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)

Summary of Findings and Analysis:

- Moulton-Udell CSD has appropriately designated the equity coordinator and communicated the roles and duties to staff, students and community members.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis:

- The Moulton-Udell CSD has appropriately implemented and communicated the grievance procedures in board policy number 102.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

E. Grievance Procedures

Applicable Requirements: Title IX Section 106.31, §§ 280.28(3) and 729A.1, 281-IAC12.3(13)

Summary of Findings and Analysis:

- The Moulton-Udell CSD board policy number 104 includes the protected classes.

Recommendations:

- None noted

Required Corrective Action(s):

There are no required corrective actions at this time.

II. Recruitment, Admissions, and Counseling

This section includes equity issues related to the recruitment, admissions and counseling related to enrollment trends in CTE programs, courses and activities on the basis of sex, racial/ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: *Guidelines* Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The course description guide provided by Moulton-Udell CSD has appropriately implemented admission criteria that allows accessibility to all students. This process included removing all prerequisite requirements to ensure all students have access.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines* Section IV.L

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district does not have appropriately implemented procedures to ensure access for students with limited English Language Skills.

Recommendations:

- Language in course and program descriptions encourages the participation of students in career and technical courses and programs where their group has been under-represented. OCR Guidelines Section IV.L

Required Corrective Action(s):

- Provide evidence that course descriptions available to students and prospective students, including limited English-speaking students, prior to and during registration

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines* Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district has appropriately implemented procedures (guidance standards, guidance curriculum, calendar of career planning activities, 8th grade career planning and four year planning) to ensure student success.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

D. Counseling of Students with Limited English-Speaking Ability or Hearing Impairments

Applicable Requirements: *Guidelines* Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district has appropriately implemented counseling services for students with limited English-speaking ability; however, evidence is out of date and does not include policies and procedures for counseling services for students with hearing impairments.

Recommendations:

- Update procedures to ensure students of limited English speaking ability and students with hearing impairments benefit from counseling services.

Required Corrective Action(s):

- Provide evidence that course descriptions available to students and prospective students, including limited English-speaking students and students with hearing impairments, prior to and during registration

E. Recruitment and Promotional Activities

Applicable Requirements: *Guidelines* Section V.A, V.C and V. E; 34 C.F.R. § 106.23

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district has appropriately implemented recruitment and promotional activities.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

III. Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: *Guidelines* Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

- This report not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

Recommendations:

IV. Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines* Section VI.D; 34 C.F.R. §106.33

Summary of Findings and Analysis:

- This report not contain the ADA (high school facilities review) portion of the Equity review. Due to COVID-19 the ADA (high school facilities review) portion of the 20-21 Equity review has been delayed. The Department of Education will work with the district to schedule a time for the review. After the review the district will receive a report detailing the ADA visit.

Recommendations:

V. Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education / Section 504)

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines* Sections IV.N and VI.A; 34 C.F.R. §§104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD does not indicate board policy 102 and 504 forms are up to date and available to ensure services for students with disabilities are receiving an equitable education.

Recommendations:

- Update board policy 102 and 504 forms to ensure services for students with disabilities are receiving an equitable education

Required Corrective Action(s):

- Moulton-Udell CSD will provide documentation regarding section 504 policies and procedures.

VI. Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines* Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD has appropriately implemented strategies for student financial assistance. There does not appear to be any bias in the awarding of financial assistance.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

VII. Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs and the application materials that students complete to obtain these positions.

A. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines* Sections VII.A and B, 34 C.F.R. §106.38(a)

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district is working to ensure student work place experiences are free of discrimination.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.

VIII. Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district's appropriately implemented strategies, Board Policy 401, to ensure equity related to employment and personnel practices is out of date.

Recommendations:

- Update Board Policy 401 to ensure the district is appropriately implementing strategies to ensure equitable employment and personnel practices.

Required Corrective Action(s):

- Moulton-Udell CSD will provide updated documentation regarding employment practices, policies, and procedures.

B. Salary

Applicable Requirements: *Guidelines* Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61

Summary of Findings and Analysis:

- The documentation provided by Moulton-Udell CSD indicated the district has appropriately implemented strategies to ensure equitable placement and advancement.

Recommendations:

- None noted

Required Corrective Action(s):

- There are no required corrective actions at this time.



IOWA

Department of Education

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 18, 2023

Dan Maeder
Superintendent
Moulton-Udell Community School District
305 E. 8th Street
Moulton, IA 52572

Dear Superintendent Maeder,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring Moulton-Udell Community School District's (CSD) immediate attention. As you are aware from our previous email communication dated June 1, 2023 and the 2020-2021 school year equity review Letter of Finding (LOF) dated June 23, 2021 (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 6, 2023, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **In Progress**. This indicates that the required action steps have not been completed.

- 2223-4518-5 Accessibility Plan
- 2223-4518-6 Accessibility, Parking
- 2223-4518-7 Accessibility, Restrooms
- 2223-4518-8 Accessibility, Entrances

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "in progress" or "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Maeder at dan.maeder@dcmustangs.com. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

It is also important that the Department has updated contact information for your district's designated Equity Coordinator (one or more individuals). Please provide updated contact information for your district's designated Equity Coordinator(s) as soon as possible. This task can be completed in the Assurances 2023-24 (Public) data collection located in

Creating excellence in education through leadership and service

the "Assurances" folder in CASA. Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

Administrative Consultant – Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Ph: (515) 336-3942
E: sueann.johnson@iowa.gov

cc: Tina Wahlert, Bureau Chief – School Improvement
Eric Heitz, Administrative Consultant – School Improvement
Sara Nickel, School Improvement Consultant – Great Prairie AEA
Scott Dreyer, School Finance Consultant – School Business Operations
Rex Harris, Moulton-Udell CSD School Board President
Dustin Harris, Moulton-Udell CSD School Board Vice President
Whitney Ballanger, Moulton-Udell CSD School Board Member
Tiffany Muszynski, Moulton-Udell CSD School Board Member
Mark Mendick, Moulton-Udell CSD School Board Member

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Sep 18, 2023 at 3:27 PM

Subject: IDOE-CASA Update on Corrective Actions (Equity) for Moulton-Udell CSD

To: Dan Maeder <dan.maeder@dcmustangs.com>

Cc: <rex.harris@moulton-udell.org>, <dustin.harris@moulton-udell.org>, <whitney.ballanger@moulton-udell.org>, <tiffany.muszynski@moulton-udell.org>, <mark.mendick@moulton-udell.org>, Wahler, Tina <tina.wahler@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Nickel, Sara <sara.nickel@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>

Dear Superintendent Maeder,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring Moulton-Udell Community School District's (CSD) immediate attention. As you are aware from our previous email communication dated June 1, 2023 and the 2020-2021 school year equity review Letter of Finding (LOF) dated June 23, 2021 (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 6, 2023, as the previous deadlines have passed.

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- 2223-4518-7 Accessibility, Restrooms
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It is also important that the Department has updated contact information for your district's designated Equity Coordinator (one or more individuals). Please provide updated contact information for your district's designated Equity Coordinator(s) as soon as possible. This task can be completed in the Assurances 2023-24 (Public) data collection located in the "Assurances" folder in CASA. Questions or concerns may be directed to SueAnn Johnson, Administrative Consultant, Equity Compliance at sueann.johnson@iowa.gov.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building

Webster City Community School District

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Wed, Jul 12, 2023 at 9:36 AM

Subject: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD

To: <mberninghaus@webster-city.k12.ia.us>, Mitch Dunham <mdunham@webster-city.k12.ia.us>

Matt Beringhaus and/or Mitch Dunham,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows an item requiring Webster City CSD's attention. Please see the information below and take the steps outlined to address each item.

The current status of the following corrective actions (equity) in CASA is **In Progress**.

- Citation ID: 1819-6867-20 - Shower Room, Accessible Stall

For the above, photos have been submitted to show completion of the required action steps, and no further documentation is needed. Please update the status in CASA for each citation by clicking the "in progress" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to the authorized individual in CASA. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at [this link](#).

The current status of the following corrective action (equity) in CASA is **In Progress**. Upon review, the required action steps have not been completed. Please complete all action steps as outlined in CASA and upload photographic proof of completion immediately, as the due date has passed.

- Citation ID: 1819-6867-11 - East Side Ramps

[Railings to west outdoor entrance](#)

[Signage with international symbol for accessibility at the accessible loading zone](#)

- [Compliant railing must be added to the length of the walkway \(on both sides\) at the west entrance to the building](#)

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn

—
SueAnn D. Johnson

Administrative Consultant, Equity Compliance

Iowa Department of Education

Grimes State Office Building

Des Moines, IA 50319



IOWA

Department of Education

McKenzie Snow, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

September 18, 2023

Matt Berninghaus
Superintendent
Webster City Community School District
820 Des Moines Street
Webster City, IA 50595

Dear Superintendent Berninghaus,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring Webster City Community School District's (CSD) immediate attention. As you are aware from our previous email communication dated July 12, 2023 and the equity review Letter of Finding (LOF) dated March 8, 2019 (amended) (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 6, 2023, as the previous deadlines have passed.

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- 1819-6867-20 Shower Room, Accessible Stall
- 1819-6867-11 East Side Ramps

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Respectfully,

SueAnn D. Johnson

Creating excellence in education through leadership and service

Grimes State Office Building | 400 E. 14th St. | Des Moines, IA 50319-0146
Phone (515) 281-5294 | www.educateiowa.gov

Administrative Consultant – Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Ph: (515) 336-3942
E: sueann.johnson@iowa.gov

cc: Tina Wahlert, Bureau Chief – School Improvement
Eric Heitz, Administrative Consultant – School Improvement
Pam Spangler, School Improvement Consultant – Prairie Lakes AEA
Scott Dreyer, School Finance Consultant – School Business Operations
Beth Van Diest, Webster City CSD School Board President
Eric Patterson, Webster City CSD School Board Vice President
Sally Greenfield, Webster City CSD School Board Director At Large
Dave Stoakes, Webster City CSD School Board Director At Large
Kelsey Clarken, Webster City CSD School Board Director District 1
Kathy Biere, Webster City CSD School Board Secretary/Treasurer

From: Johnson, SueAnn <sueann.johnson@iowa.gov>

Date: Mon, Sep 18, 2023 at 3:49 PM

Subject: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD

To: <mberninghaus@webster-city.k12.ia.us>

Cc: <vandlestbeth@gmail.com>, <hawkeyeeric@yahoo.com>, <kinelsn@gmail.com>, Sally Greenfield <greenfield.sally@gmail.com>, <davestoakeswc@gmail.com>, <kbriere@webster-city.k12.ia.us>, Wahlert, Tina <tina.wahlert@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>, Mitch Dunham <mdunham@webster-city.k12.ia.us>

Dear Superintendent Berninghaus,

The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring Webster City Community School District's (CSD) immediate attention. As you are aware from our previous email communication dated July 12, 2023, and the equity review Letter of Finding (LOF) dated March 8, 2019 (amended) (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 6, 2023, as the previous deadlines have passed.

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- 1819-6867-20 Shower Room, Accessible Stall
- 1819-6867-11 East Side Ramps

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Respectfully,

SueAnn D. Johnson

—
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov

Fwd: Webster city citations

2 messages

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Tue, Dec 3, 2024 at 5:11 PM

Save the entire email chain, please.

----- Forwarded message -----

From: **Dunham, Mitch** <mdunham@webster-city.k12.ia.us>
Date: Tue, Sep 19, 2023 at 3:20 PM
Subject: Webster city citations
To: Johnson, SueAnn <sueann.johnson@iowa.gov>

This is Mitch Dunham the Building and grounds director at Webster city community schools. I am dealing with two corrective action citations. 1819-6867-20 shower room accessible stall. There has been signage installed at each shower room showing directions to the accessible shower room. final photos had been sent and uploaded 2-15-23. Citation 1819-6867-11 east side ramps. Directional signage had been placed at the east entrance to direct to the west accessible zone. We had to tear up and repour concrete for the whole west ramp. The flat area just outside the door was found to be too short for the accessible dimensions. The repair threw off the grade for the whole walkway.

We do still need to install the new railing which is still in fabrication. That was approved by Scott Dryer to only be on the south side of the sidewalk being we have an 8ft sidewalk angling into this on the north side. Please update these items ASAP and show the first as complete 2-15-23 and the second in progress. Please send this update to me as I need to update the superintendent as well as many board members since the citation was sent yesterday. ALSO as a reminder I will have to say something has to be done with my IDOE-CASA access so I can see these items without interpretation. All attempts of repairs on your end have failed to resolve my login problem and the last repair that was tried seemed to have messed up my login on the IDPH site. This is very frustrating not to be able to have quick and simple logins for updates that may have prevented some confusion.

--
Mitch Dunham
Director of Buildings, Grounds and Maintenance
Webster City Community School District
515-835-2750

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:54 PM

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>
Date: Wed, Sep 20, 2023 at 2:23 PM
Subject: Fwd: Webster city citations
To: Barleen, Robert <robert.barleen@iowa.gov>, Mitch Dunham <mdunham@webster-city.k12.ia.us>, Dryer, Scott

<scott.dryer@iowa.gov>
Cc: Heitz, Eric <eric.heitz@iowa.gov>, Michael Wright <mike.wright@iowa.gov>

Mitch,

I received a notification that the status of citation #1819-6867-11 has changed to "for review." Were you able to do that or did someone else have access to make that change? I see photos for the signage have been added, and they look good. However, I do not see any photos of a new railing, which I believe you discussed previously with Scott Dreyer. I will leave this citation open until all parts have been completed, including uploading photos of the new railing when it is installed.

Thank you,
SueAnn

----- Forwarded message -----

From: **Dunham, Mitch** <mdunham@webster-city.k12.ia.us>
Date: Wed, Sep 20, 2023 at 2:10 PM
Subject: Re: Webster city citations
To: Johnson, SueAnn <sueann.johnson@iowa.gov>

1819-6867-20 Still no luck with access. I had The superintendent's secretary Maryellen send you photos that should have been recieved on 2-15-2023 and comments. There was a link somebody created on her screen that she could not access either. I also had her send updates on 18196867-11

On Tue, Sep 19, 2023 at 3:57 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:
Mitch-

Thank you for your response. I am copying Mike, Bob, and Scott for their input here, as well.

Concerning citation #1819-6867-20 (shower room accessible stall), I do not see directional signage at any inaccessible shower room that would direct an individual to the nearest accessible shower room. I can see only two photos of signage at accessible restrooms. The other uploads are notes. So, this addresses part of the corrective action but not the issue of signage at inaccessible shower rooms. Scott, perhaps you can also take a look at this action in CASA to make sure I haven't missed something.

When photos of signage at inaccessible shower rooms have been uploaded, I still need you or another individual with access in CASA to change the status from "action overdue" to "ready for review." I cannot do this on my end. Here again are the instructions: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>

I understand your frustration about having issues with CASA. In Bob's last email to you on Aug. 29th, he wrote:

Mitch, I had a look at your Portal accounts. I made the one with the [msn.com](https://www.msn.com) email address inactive, so don't use that one. You should be using your login username of M.DUNHAM@IOWAID

Once you get logged in, please click on the CASA menu link and let us know if it does take you into CASA. Try that out and we'll see how things go from there.

Could you let us know if you used the login above and what happened? Hopefully Bob and Mike can get to the bottom of whatever is preventing you from accessing the action in CASA.

So, two things need to happen for me to be able to close citation #1819-6867-20. 1) I need to see uploaded photos of directional signage at the inaccessible shower rooms, and 2) I need to see the status of the action changed to "ready for review." Once those steps are completed, I can close the action.

Thank you,
SueAnn

On Tue, Sep 19, 2023 at 3:20 PM Dunham, Mitch <mdunham@webster-city.k12.ia.us> wrote:

This is Mitch Dunham the Building and grounds director at Webster city community schools. I am dealing with two corrective action citations. 1819-6867-20 shower room accessible stall. There has been signage installed at each shower room showing directions to the accessible shower room. final photos had been sent and uploaded 2-15-23. Citation 1819-6867-11 east side ramps. Directional signage had been placed at the east entrance to direct to the west accessible zone. We had to tear up and repour concrete for the whole west ramp. The flat area just outside the door was found to be too short for the accessible dimensions. The repair threw off the grade for the whole walkway.

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--

Mitch Dunham
Director of Buildings, Grounds and Maintenance
Webster City Community School District
515-835-2750

--

SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov

Regular office hours:
Monday - Friday
8:00am - 4:30pm



This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--
Mitch Dunham
Director of Buildings, Grounds and Maintenance
Webster City Community School District
515-835-2750

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942
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Regular office hours:
Monday - Friday
8:00am - 4:30pm



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[Quoted text hidden]

Fwd: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:57 PM

----- Forwarded message -----

From: **Spangler, Pam** <pam.spangler@iowa.gov>
Date: Wed, Sep 27, 2023 at 9:59 AM
Subject: Re: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD
To: Johnson, SueAnn <sueann.johnson@iowa.gov>
Cc: Dryer, Scott <scott.dryer@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>

I believe the June 14th comment is correct. I thought Scott had talked with them about adding signage to the nearby shower room to meet ADA compliance. I believe approval is acceptable.

PS - Buffy is not the consultant on this one; it's me. 😊 Not a big deal - I just don't want you to wait for her reply.



Pam Spangler
School Improvement Consultant
Iowa Department of Education
Grimes State Office Building
400 E. 14 Street
Des Moines, IA 50319
Phone: 515-229-6425

Regular office hours:

Monday - Friday
7:30 am - 4:00 pm

Summer office hours (June 2 - August 17, 2023)

Monday - Thursday 7:30 am - 5:00 pm
Friday 8:00 am - 12:00 pm

NOTICE TO RECIPIENT: THIS MESSAGE AND ANY RESPONSE TO IT MAY CONSTITUTE A PUBLIC RECORD, AND THEREFORE, MAY BE AVAILABLE UPON REQUEST IN ACCORDANCE WITH IOWA PUBLIC RECORDS LAW, IOWA CODE CHAPTER 22.

Notice: This e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it. Thank you.

On Wed, Sep 27, 2023 at 9:40 AM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Good morning, all,

Webster City has uploaded additional photos for citation #1819-6867-20 (shower room - accessible stall) showing directional signage to accessible locker/shower rooms. Although I've never been on site at the school, I'm inclined to approve this part of the corrective action based on the photos- unless anyone has any additional concerns.

There seems to have been a separate issue as part of that same action involving adding one accessible stall. See the following note that was uploaded to CASA as a Word doc:

"December 20, 2019 - As part of our equity audit last year, we had the following citation:

Remove one toilet stall and replace with 3' x 4' 3" with 32" swing out door and ADA stool and grab bar.

However, this particular issue requires "behind the wall" changes in the plumbing, which likely includes asbestos removal. In light of the scope of work required, we have this in our plans as our school board determines the scope of the work that will be required to bring our entire high school up to date.

For these reasons, I'm requesting that Citation ID 1819-6867-20 be changed to "in progress" as it needs to be part of a much larger project."

Another note was added more recently:

"June 14, 2023 - The Webster City Schools has met the requirements of this outstanding item on the Corrective Action plan. The step in the shower room has been resolved by adding signage to the nearby newer shower room, which is ADA compliant."

Buffy, is this the other issue you were recalling? If so, I think that again, having not ever been on site, but just based on the notes and photos, I'm inclined to approve this part of the corrective action.

This will leave only the handrail issue, and I will follow up with Scott about that separately.

Please let me know if anyone has any concerns with my proposed approval for this action. Thanks!

SueAnn

On Fri, Sep 22, 2023 at 3:22 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

I think that's a great idea, Scott. I will run this by Tina at our meeting Monday, and if approved, will work on setting up that Zoom.

I appreciate everyone's input on this matter! :)

Have a great weekend!

SueAnn

On Fri, Sep 22, 2023 at 3:00 PM Dryer, Scott <scott.dryer@iowa.gov> wrote:

This sounds good to me. Remember we are dealing with three different Superintendents I believe. So the current Supt. does not have any context. I don't think the current buildings and grounds director is the same person from the original visit either.

Maybe start with a ZOOM with me, you and their team?

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD

Education Program Consultant - School Finance

Bureau of School Business Operations

Iowa Department of Education

Grimes Office Building; 3rd Floor

400 East 14th Street

Des Moines, Iowa 50319-0146

IDOE Cell Phone: 515-402-8700

scott.dryer@iowa.gov

On Fri, Sep 22, 2023 at 2:47 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

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Thanks for your willingness to do that, Scott. I am trying to figure out any other way to do this that would not require that extra effort on your part and still get us the answers we need to close out these matters for good. I wonder if it would be possible for

them to do a live streamed walk through? Alternatively, they could send photos of the existing shower room and maybe we could see enough that way to know whether there are outstanding issues. I would be willing to try something like that to save you the trip. Let me know your thoughts.

SueAnn

On Fri, Sep 22, 2023 at 2:12 PM Dryer, Scott <scott.dryer@iowa.gov> wrote:

SueAnn,

This was some time ago, and I do not recall the exact issues in that shower room. I will try to find time next week to run up to WC and take a look at it. I will also need to see if they have another shower room that is accessible in the building.

I will contact Supt. Berninghaus and the B&G Director early next week.

Scott

W. Scott Dryer, Ed.S., Ed.D./ABD

Education Program Consultant - School Finance

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Iowa Department of Education

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IDOE Cell Phone: 515-402-8700

scott.dryer@iowa.gov

On Wed, Sep 20, 2023 at 3:48 PM Johnson, SueAnn <sueann.johnson@iowa.gov> wrote:

Thanks for keeping me in the loop, Pam- I appreciate it!

Scott- it seems like there may be another issue regarding one of the shower rooms. When you have a moment, could you please take a look at both of Webster City's open corrective actions and let me know what specifically we are still needing from the district. I'm happy if you want to reply to Mitch's email directly (and copy myself and Pam) instead, if that would be easier. Sorry to put you on the spot- I know you weren't the one to do the original on-site visit, but you have been there most recently. :)

I'm hoping it doesn't come to this, but if Mitch is not clear on what action steps still need to be taken, we have the option to do a follow-up visit as we did in the case of East Marshall. Let's give it a little more communication before deciding whether that is necessary, but feel free to chime in with your thoughts about this, both of you.

Thanks,
SueAnn

----- Forwarded message -----

From: **Spangler, Pam** <pam.spangler@iowa.gov>

Date: Wed, Sep 20, 2023 at 2:27 PM

Subject: Fwd: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD

To: SueAnn Johnson <sueann.johnson@iowa.gov>

I received this email from the maintenance person at Webster City. You may want to check in with Scott Dryer about the shower that Mitch is discussing. I remember that Scott had a conversation with Mitch about that - I don't believe that they added a photo, as was required in the corrective action.



Pam Spangler

School Improvement Consultant
Iowa Department of Education
Grimes State Office Building
400 E. 14 Street
Des Moines, IA 50319
Phone: 515-229-6425

Regular office hours:

Monday - Friday
7:30 am - 4:00 pm

Summer office hours (June 2 - August 17, 2023)

Monday - Thursday 7:30 am - 5:00 pm
Friday 8:00 am - 12:00 pm

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----- Forwarded message -----

From: **Berninghaus, Matt** <mberninghaus@webster-city.k12.ia.us>
Date: Wed, Sep 20, 2023 at 2:24 PM
Subject: Fwd: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD
To: <pam.spangler@iowa.gov>
Cc: Mitch Dunham <mdunham@webster-city.k12.ia.us>

Pam

I'm confused by the email below. I spoke with Dr. Ross (retired Webster City Superintendent) and she indicated that the shower issue had been resolved. I checked the CASA website and there are supporting documents and an explanation of the corrective action that had been taken:

Proper accessible signage from the inaccessible shower room, pointing to the accessible shower room.
Proper accessible signage added outside of the accessible shower rooms.

When I checked the reviewer comments it states "The district has informed us that this noncompliance is being addressed with the removal of the lip in the shower room". To my knowledge this was not to be the corrective action taken as there was an accommodating shower room nearby. Any assistance that you could provide would be greatly appreciated.

Thank you.

cc Mitch - Webster City Maintenance Director

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>
Date: Mon, Sep 18, 2023 at 3:49 PM
Subject: IDOE-CASA Update on Corrective Actions (Equity) for Webster City CSD
To: <mberninghaus@webster-city.k12.ia.us>
Cc: <vandiestbeth@gmail.com>, <hawkeyeric@yahoo.com>, <kinelsn@gmail.com>, Sally Greenfield <greenfield.sally@gmail.com>, <davestoakeswc@gmail.com>, <kbiere@webster-city.k12.ia.us>, Wahlert, Tina <tina.wahlert@iowa.gov>, Heitz, Eric <eric.heitz@iowa.gov>, Pam Spangler <pam.spangler@iowa.gov>, Dryer, Scott <scott.dryer@iowa.gov>, Mitch Dunham <mdunham@webster-city.k12.ia.us>

Dear Superintendent Berninghaus,

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The Iowa Department of Education's Consolidated Accountability and Support Application (CASA) corrective action dashboard currently shows several items requiring Webster City Community School District's (CSD) immediate attention.

As you are aware from previous email communication dated July 12, 2023, and the equity review Letter of Finding (LOF) dated March 8, 2019 (amended) (see attached), it is critically important that these items are addressed to bring your district and the Iowa Department of Education (Department) into compliance with state and federal anti-discrimination laws and guidelines and to ensure continued federal financial assistance for your district. Please see the information below and take the steps outlined to address each item no later than Friday, October 6, 2023, as the previous deadlines have passed.

The current status of the following corrective actions (equity) in CASA is **Action Overdue** or **In Progress**. This indicates that the required action steps have not been completed.

- 1819-6867-20 Shower Room, Accessible Stall
- 1819-6867-11 East Side Ramps

Please complete all action steps as outlined in CASA and upload photographic proof of completion. Then, update the status in CASA for each citation by clicking the "in progress" or "action overdue" button on the far right of the action step to activate the option to mark the action as ready for review. After all required steps have been completed, a confirmation email will be sent to Superintendent Berninghaus at mberninghaus@webster-city.k12.ia.us. The corrective action will then be closed in CASA. More information about the process for addressing a citation in CASA can be found at: <https://educateiowa.gov/sites/default/files/2023-01/CitationInstructions2022-23.pdf>.

Thank you for your prompt attention to the above items. Please contact me with any questions or concerns. It is my pleasure to support your efforts to make your school district an accessible and welcoming environment for all.

Respectfully,

SueAnn D. Johnson

--

SueAnn D. Johnson

Administrative Consultant, Equity Compliance
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Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942

Email: sueann.johnson@iowa.gov

Regular office hours:

Monday - Friday

8:00am - 4:30pm



Department of Education

This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--

Matt Berninghaus

Webster City Community School District
Superintendent of Schools
[820 Des Moines Street](mailto:820DesMoinesStreet@webster-city.k12.ia.us)
[Webster City, IA 50595](mailto:820DesMoinesStreet@webster-city.k12.ia.us)

Stratford Community School District
Superintendent of Schools
[1000 Shakespeare Avenue](mailto:1000ShakespeareAvenue@stratford.k12.ia.us)
[Stratford, IA 50249](mailto:1000ShakespeareAvenue@stratford.k12.ia.us)

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--

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Email: sueann.johnson@iowa.gov

Website: <https://educateiowa.gov/>



Department of Education

**Webster City Community School District
Letter of Finding - Final Equity Report
December 17-19, 2018**

**Amended 03.08.2019
See Section III, noted in Red**

**Section I
Administrative Requirements**

This section includes issues related to the board policies, the functioning of the equity coordinator, the grievance procedure and the dissemination of information regarding those three items to parents, staff, students and the community.

A. Annual Notice of Nondiscrimination

Applicable Requirements: Guidelines Section IV.O; 34 C.F.R. §100.6(d)

Summary of Findings and Analysis:

- The visiting team reviewed all documents and board policies provided by the district to determine if the Annual Notice of Nondiscrimination is being provided annually to constituents and that it ensures equal opportunity in student program and employment regardless of race, color, national origin, sex, sexual orientation, gender identity, marital status, socioeconomic status, disability, religion, or creed. **There was evidence of violation: Section IV.O; 34 C.F.R. §100.6(d)**
 - School Board Policy 500 did not name the district equity coordinator and the coordinator's contact information.
 - School Board Policy 401.2 does not have the correct protected classes. It is missing sexual orientation and gender identity.
 - School Board Policy 103 listed had incorrect contact information and CTE strand information.
 - School Board Policy 103E1 does not have complete contact information for the superintendent.
 - The job application provided did not have the name or contact information of the equity coordinator.

Recommendations:

- The continuous notice, not the annual notice, was used in the student registration advertisement in the local newspaper article provided the team for review. The visiting team recommends district administration review with all district personnel the differences between the annual and continuous notice and create board approved process and procedure that ensures the both the annual and continuous notices are published correctly.

Required Corrective Action(s): Section IV.O; 34 C.F.R. §100.6(d)

- The district must correct board policy 500 to include the name and contact information of the district equity coordinator.
- The district must correct board policy 401.2 to include the complete list of protected classes; race, color, national origin, sex, disability, age, religion, creed, sexual orientation, and gender identity.
- The district must correct board policy 103 with all of the correct contact information and the up-to-date Career and Technical Education (CTE) strands.
 - Agricultural, Food, and Natural Resources
 - Applied Science, Technology, Engineering, and Manufacturing
 - Arts, Communication, and Information Systems
 - Business, Finance, Marketing, and Management
 - Health Science
 - Human Services
- The district must correct board policy 103E1 with complete contact information for the superintendent.
- The district must correct its job application so to provide the name or contact information of the equity coordinator within the nondiscrimination notice.

B. Continuous Notice of Nondiscrimination

Applicable Requirements: 34 C.F.R. §§100.6(d), 104.8, and 106.9; and 28 C.F.R. 35.106

Summary of Findings and Analysis:

- The visiting team reviewed all materials provided by the district to determine in the Continuous Notice of Nondiscrimination has accurate information and is provided in all major written publications. **There was evidence of violation: 34 C.F.R. §§100.6(d), 104.8, and 106.9; and 28 C.F.R. 35.106**
 - The English version of the continuous notice did not name the equity coordinator.
 - The Spanish version of the continuous notice did not name the equity coordinator or have the email within the contact information.
 - The High School Staff Handbook had incorrect information for the equity coordinator.
 - The nondiscrimination statement, on the job application provided, did not have grievance procedure information.
 - The Middle School Handbook used the annual notice instead of the continuous notice and had incorrect information concerning the equity coordinator.

Recommendations:

- Please refer to recommendation in Section I A.

Required Corrective Action(s):

- The district must correct the English version of the continuous notice to include the name of the equity coordinator.
- The district must correct the Spanish version of the continuous notice to include the name of the equity coordinator and complete contact information.
- The district must correct the High School Staff Handbook with the correct information for the equity coordinator.
- The district must correct the job application provided to include grievance procedure information.
- The district must correct the Middle School Handbook continuous notice from the annual notice to the continuous notice, with the correct information for the equity coordinator.

C. Designation of Equity Coordinators

Applicable Requirements: *Guidelines Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)*

Summary of Findings and Analysis:

- The visiting team reviewed materials provided by the district to determine if:
 - the designation of district equity coordinators (Equity, Title IX, Section 504 and Title II) and their complete contact information are completed on an annual basis, and
 - if a summary of activities conducted the the district equity coordinator, including training received for the role and function and training on sexual harassment has occurred.
 - **There was evidence of a violation: *Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)***
 - A summary of activities conducted the the district equity coordinator, including training received for the role and function and training on sexual harassment was not provided. Evidence, including interviews, indicated these activities do not occur annually.

Recommendations:

- Through interviews and documents provided, it was determined that equity coordinators were named and approved during a board meeting. However, the naming of the district Equity Coordinator was inadvertently left out of the board minutes. The visiting team suggests the district review current school board minute documentation with those responsible to ensure all pertinent information is consistently and accurately included in monthly board meeting minutes.

Required Corrective Action(s): *Section IV.O; 34 C.F.R. §§104.7(a) and 106.8(a); 28 C.F.R. § 35.107(a)*

- The district must create and implement board approved procedures that ensures:
 - the district equity coordinator has an annual checklist of duties to be performed and that a summary is kept of those completed duties and presented to the board.

- annual review of the duties of the district equity coordinator and training is provided for that person on a yearly basis or when necessary.

D. Grievance Procedures

Applicable Requirements: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)

Summary of Findings and Analysis:

- The visiting team reviewed the district grievance procedures and policies. **There was evidence of a violation: 34 C.F.R. §§104.7(b) and 106.8(b); 28 C.F.R. § 35.107(b)**
 - The district did not provide a list of publications where the grievance procedure is published for stakeholders.
 - Equity coordinator information was incorrect within the board policy reviewed

Recommendations:

- While amending your current grievance procedures, the visiting team recommends the district use the newest grievance procedure recommended by the Department of Education. It can be found at this link: [Grievance Procedure](#) policy 102R1.

Required Corrective Action(s):

- The district must:
 - Create board approved procedure that ensures the publication of grievance procedures for stakeholders, and within this procedure keep record of where they are published.
 - Correct its current board policy 102R1, to reflect the correct information for the district equity coordinator

Harassment, Bullying and Discipline

Summary of Findings and Analysis:

- The visiting team reviewed district board policy provided, and interview information garnered from constituents, to determine accuracy of policy and procedure concerning harassment, bullying and discipline. **There was no evidence of violation.**

Recommendations:

- Interviews with constituents indicated there were differing opinions amongst district

personnel and patrons concerning:

- a consistent definition of bullying and harassment, and
- the current process and practice, by the appropriate district personnel, during a formal bullying and harassment investigation.
- The visiting team recommends the district review your current definitions, practices and procedures and revise if necessary. After the revision, provide the appropriate training for district personnel and information to district constituents, concerning definition, practices and procedures for bullying and harassment.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Section II Recruitment, Admissions, and Counseling

This section includes equity issues related to the recruitment, admissions and counseling related to enrollment trends in CTE programs, courses and activities on the basis of gender, racial / ethnic background, and disability.

A. Admissions Criteria

Applicable Requirements: Guidelines Sections IV.A, IV.F, IV.K, and IV.N; 34 C.F.R. §§100.3(a) and (b)(1)(v), 104.4(a) and (b), and 106.21

Summary of Findings and Analysis:

- The visiting team reviewed documents provided by the district, and information garnered from constituent interviews, to determine if the high school course handbook/registration guide and master schedule are published and available, and that it contains general information including:
 - graduation requirements
 - an explanation of the grading system
 - a description of each CTE program, the number of credits available, and any prerequisites
 - An indication that all students are eligible to take CTE courses and are not discriminated according to race, color, national origin, sex or disability.
- **There was no evidence of violation.**

Recommendations:

- There are no recommendations at this time.

Required Corrective Action(s):

- There are no corrective actions at this time.

B. Access for National Minority Students with Limited English Language Skills

Applicable Requirements: *Guidelines Section IV.L*

Summary of Findings and Analysis:

- The visiting team reviewed information garnered from constituent interviews to garner information if the district provides course descriptions that:
 - Are available to students and prospective students, including limited English-speaking students, prior to and during registration
 - Are free of discriminatory language based on race, color, national origin, sex or disability.
 - Contain language in course and program descriptions encouraging the participation of students in career and technical courses and programs where their group has been under-represented.

- The visiting team was provided no documentation showing this access was in place for minority and limited English language learners. **There was evidence of violation: *Section IV.L***

Recommendations:

- There are no recommendations at this time.

Required Corrective Action(s): *Section IV.L*

- The district must create a board approved process that ensures minority and limited English language learners are provided course descriptions that:
 - Are available to students and prospective students, including limited English-speaking students, prior to and during registration
 - Are free of discriminatory language based on race, color, national origin, sex or disability.
 - Contain language in course and program descriptions encouraging the participation of students in career and technical courses and programs where their group has been under-represented.

C. Counseling and Prospects for Success

Applicable Requirements: *Guidelines Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36*

Summary of Findings and Analysis:

- The visiting team reviewed information garnered from constituent interviews to garner information if the district provides counseling materials and practices that:
 - are free of stereotyping in language, content, and illustration
 - do not contribute to disproportion in CTE enrollment.
- The visiting team was provided no documentation showing this assurance was in place for all learners. **There was evidence of violation: *Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36***

Recommendations:

- As the district creates a board approved process indicated in Required Corrective Actions, the visiting team suggests you consider sharing and including these assurances in the following areas:
 - Action steps of counselors to review documents and practices
 - Guidance standards
 - Guidance curriculum
 - Calendar of career planning activities
 - 8th grade career planning activities and documents
 - Four-Year planning documents
- Consider contacting Terese Jurgensen at the Iowa Department of Education for advice and assistance; 515-326-5378, terese.jurgensen@iowa.gov

Required Corrective Action(s): Sections V.A and B; 34 C.F.R. §§100.3(a) and (b); 104.37(b), and 106.36

- The district must create a board approved process that ensures all students receive counseling materials and practices that:
 - are free of stereotyping in language, content, and illustration
 - do not contribute to disproportion in CTE enrollment.

D. Counseling of Students with Limited English Speaking Ability or Hearing Impairments

Applicable Requirements: Guidelines Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)

Summary of Findings and Analysis:

- The visiting team reviewed documents provided and information garnered from interviews to determine if counseling services are provided to all students. It was determined that:
 - Procedures to ensure students of limited English Speaking Ability benefit from counseling services are not in place
 - Procedures to ensure students with hearing impairments benefit from counseling services are not in place
 - **There is evidence of a violation: Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)**

Recommendations:

- There was indication from numerous interview groups that counseling services, and other related services, would be provided to ELL and hearing impaired students if needed. However, the requirement of a documented process/procedures is not in place. The confidence district personnel and patrons shared that counseling services and related services would be provided, stemmed from their confidence that specific professionals within the district would see to it equal access was provided. The visiting team encourages the district to review said procedures, and all remaining procedures that ensure equal access for all students, to determine if there is board approved procedure in place documenting these assurances. If necessary after the review, create board approved process that ensure equal access, and review these processes with the appropriate district personnel on a yearly basis.
- During your process to develop the board approved procedure discussed in the Required Actions below, the visiting team suggests contacting Pam McDonnell; 515-380-5115, pam.mcdonnell@iowa.gov for guidance with the English Learner procedure. In addition, consider contacting Susan Rolinger, Director of Extended Learning for the School for the Deaf and Iowa Educational Services for the Blind and Visually Impaired: srolinger@iowaschoolforthe deaf.org, 515.782.3792

Required Corrective Action(s): Section V.D; 34 C.F.R. 100.3(a) and (b) and 104.37(b)

- The district must:
 - Create board approved procedures to ensure students of limited English Speaking Ability benefit from counseling services.
 - Create board approved procedures to ensure students with hearing impairments benefit from counseling services.

E. Recruitment and Promotional Activities

Applicable Requirements: Guidelines Section V.A, V.C and V. E; 34 C.F.R. § 106.23

Summary of Findings and Analysis:

- The visiting team reviewed materials provided by the district and used information gathered from constituent interviews to determine whether Career and Technical Education (CTE) attendance center and course enrollment data, disaggregated by sex, race, color, national origin, and disability are reviewed annually. **There was evidence of a violation: Section V.A, V.C and V. E; 34 C.F.R. § 106.23**

Recommendations:

- As the district reviews and amends its procedure to review course and program enrollment data, the visiting team recommends care is taken in determining what district professional groups take part in the discussion. Consider building level administration, counselors and CTE staff as the foundation of this yearly committee.
- The visiting team recommends the use of the district's student management system and reported BEDS information for the collection of the disaggregated data used for this yearly review of course and program enrollment data.
- The visiting team recommends the district reviews all high school program and course enrollment data, beyond the required CTE data. Often, very important information is

made available by the review of this additional data.

Required Corrective Action(s): Section V.A, V.C and V. E; 34 C.F.R. § 106.23

- The district must create a board approved procedure that ensures the collection and review of CTE program and course enrollment data. This procedure must include the following:
 - Attendance center, program, and course enrollment data disaggregated by sex, race, color, national origin and disability for the last 3 years.
 - A description of how these data are:
 - collected and used
 - with what frequency
 - by whom
 - for what purposes
 - A summary of attendance center, program, and course enrollment-related trends noted over the past three years
 - A summary of steps taken to increase participation in programs where disproportion was found.

Section III
Accessibility for Students with Disabilities

This section includes the review of accessibility of facilities and the instructional program for students, staff, parents, and community members with disabilities.

A. Accessibility for Students with Disabilities

Applicable Requirements: Guidelines Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

Summary of Findings and Analysis:

- A walk-through of the high school facility was completed on November 27 and 28, 2018. Following are the high school building construction start dates and subsequent standards:
 - Original Building (Academic wing, Auditorium and PE Gym) - **1962 (Section 504 Standards)**
 - Vocational Building Addition - **1999 (1991 ADA Standards)**
 - Greenhouse Addition - **2010 (2010 ADA Standards)**
 - Competition Gym Addition - **2012 (2010 ADA Standards)**

There was evidence of violation: **Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151**

- **Parking:** The west high school parking (all west entrances) lot has one hundred thirty-six (136) spaces, four (4) of which are designated as accessible. Two (2) of those spots are van accessible. The parking lot does not meet the:
 - **Section 504 Standards:** *Are qualified students denied access in using the parking lot on the basis of their handicap? (104.43).*
 - **1991 ADA Standards:** *Is there an adequate number of accessible parking spaces available [1 for every 25 spaces up to 100]? (4.1 .2(5)(a) & 4.6.1)*
- **Ramps:** The main access to the band and choir room has two steps down to the hall leading to both rooms. There is no lift or ramp at that access point. However, the band and choir room are accessible to entitled individuals via a stage backdoor, to a sloped access into the band room. From the band room a qualified student can get to the choir room. The ramp leading into the band room exceeds the slope ratio of 12:1.
 - **Section 504 Standards:** *Are qualified students denied access in using ramps on the basis of their handicap? (104.43)*
 - **2010 ADA Standards:**
 - *If there is a ramp is it at least 36" wide? If there are handrails, measure between the handrails (405.5)*
 - *Is the surface stable, firm and slip resistant? (405.4)*
 - *For each section of the ramp, is the running slope no greater than 1:12? Rises no greater than 3" with a slope no steeper than 1:8 and rises no greater than 6" with a slope no steeper than 1:10 are permitted when slopes are necessary due to space limitations. (405.2)*
- **Ramps:** The ramp at the east side of the building is 76' long. The first 52' of the ramp meets the slope ratio requirement of 12:1. The upper 24' of the ramp exceeds the slope ratio of 12:1.
 - **Section 504 Standards:** *Are qualified students denied access in using ramps on the basis of their handicap? (104.43)*
 - **2010 ADA Standards:**
 - *If there is a ramp is it at least 36" wide? If there are handrails, measure between the handrails (405.5)*
 - *Is the surface stable, firm and slip resistant? (405.4)*
 - *For each section of the ramp, is the running slope no greater than 1:12? Rises no greater than 3" with a slope no steeper than 1:8 and rises no greater than 6" with a slope no steeper than 1:10 are permitted when slopes are necessary due to space limitations. (405.2)*
- **Entrances:** All four (4) entrances; West Main, South Gym, Competition Gym, and East (Lincoln) are accessible. However, there is no signage indicating this accessibility.
 - **UFAS Standards:** *Does signage indicate the accessible entrance using the international symbol of accessibility? (4.30.5)*
- **Lobbies:** The lobby areas at the West Main and Competition Gym entrances do not have directional signage indicating the direction/location of accessible toilet rooms.
 - **1991 ADA Standards:** *Do signs which provide direction to, or information about, functional spaces of the building, comply with the appropriate requirements for directional signage? (4.1.3(16)(b) & 4.30)*
- **Rooms and Spaces:** The only entrance to the **weight** wrestling room has a threshold that exceeds ¼".

- **Section 504 Standards:** *Are qualified students denied access in using rooms and spaces on the basis of their handicap? (104.43)*
- **1991 ADA Standards apply:** *Are all thresholds level (less than 1/4"), or beveled, with a slope no greater than 1:2 up to 1/2" high? (4.13.8)*
- **Rooms and Spaces:** The project storage room entrance door, in the Industrial Technology room/lab, has a threshold that exceeds ¼ "
 - **Section 504 Standards:** *Are qualified students denied access in using rooms and spaces on the basis of their handicap? (104.43)*
 - **1991 ADA Standards apply:** *Are all thresholds level (less than 1/4"), or beveled, with a slope no greater than 1:2 up to 1/2" high? (4.13.8)*
- **Rooms and Spaces:** The band and choir room sloped accessible access for qualified students exceeds the slope ratio of 12:1.
 - **Section 504 Standards:** *Are qualified students denied access in using ramps on the basis of their handicap? (104.43)*
 - **ANSI Standards apply:** *Do all ramps have a slope no greater than 1:12? (5.1.1)*
- **Toilet Rooms:** There is no latched door leading into the toilet rooms in the Competitive Gym lobby area. Signage is located around the corner, inside the exterior privacy barrier leading into the toilet room, and is not visible from the hallway.
 - **2010 ADA Standards:** *For toilet room signs, is the sign mounted on the wall on the latch side of the door? (703.4.2)*
- **Toilet Rooms:** The boys and girls toilet rooms on second floor of the original building contain accessible stalls. However, the door to the accessible stall is only 26" wide for access.
 - **Section 504 Standards:** *Are qualified students denied access in using toilet rooms on the basis of their handicap? (104.43)*
 - **UFAS Standards apply:** *Is there one toilet stall that is 3' wide, 4'3" deep, a door 32" wide and swings out? (5.6.2)*
- **Toilet Rooms:** The accessible stall in the faculty toilet room has only one grab bar on the side wall.
 - **Section 504 Standards:** *Are qualified students denied access in using toilet rooms on the basis of their handicap? (104.43)*
 - **UFAS Standards apply:** *Is the back grab bar in the water closet between 33" & 36" from the floor, at least 36" long, & beginning 12" from the side wall? (4.16.4)*
- **Shower Rooms:** The shower room in the **boys and girls** PE locker room has a 6" lip at the entrance of the shower room.
 - **Section 504 Standards:** *Are qualified students denied access in using shower rooms on the basis of their handicap? (104.43)*
 - **UFAS Standards apply:** *Is the floor level getting into wheel-in shower stalls? (4.21.7)*
- **Shower Rooms:** The shower room in the girls PE locker room does not have an accessible toilet stall.
 - **Section 504 Standards:** *Are qualified students denied access in using toilet rooms on the basis of their handicap? (104.43)*
 - **UFAS Standards apply:** *Is there one toilet stall that is 3' wide, 4'3" deep, a door 32" wide and swings out? (5.6.2)*

Recommendations:

- There is a Tempering Valve box at 58" high that protrudes 14" from the wall in the girls PE locker room. The visiting team recommends placing a permanent article directly beneath the valve box so to make this protrusion cane-detectable.
- There is an emergency chemical shower in the Physical Science Room. The visiting team recommends the district consider removing the cabinet from beneath the shower and also provide an accessible grab hook for a qualified individual to use if they had to engage the shower.

Required Corrective Action(s): Section IV.N; 34 C.F.R. §§104.21-104.23; 28 C.F.R. §§ 35.149-35.151

- **Parking:** The district must add one (1) accessible parking space, with signage using the universal symbol for accessibility to the West parking lot.
- **Ramps:** The district must repair the current ramp leading into the band room to, at a minimum, a 1:12 slope ratio.
- **Ramps:** The district must repair the ramp leading to an accessible entrance, on the east side of the building, so that the entire ramp meets, at a minimum, a 1:12 slope ratio.
- **Entrances:** The district must place signage, with the universal symbol for accessibility, indicating an accessible entrance at all entrances that are accessible. At entrances not accessible, the district must place directional signage, with the universal symbol for accessibility, indicating the direction of the nearest accessible entrance.
- **Lobbies:** The district must place directional signage, with the universal symbol of accessibility, indicating the direction/location of accessible toilet rooms, in the lobby areas of the West Main and Competition Gym entrances.
- **Rooms and Spaces:** The district must alter the entrance to the weight room threshold level to a ¼" or less, or beveled with a slope no greater than 1:2 up to 1/2" high.
- **Rooms and Spaces:** The district must alter the project storage room entrance door, in the Industrial Technology room/lab threshold level to a ¼" or less, or beveled with a slope no greater than 1:2 up to 1/2" high.
- **Rooms and Spaces:** The district must alter the ramp to the band room to a slope ratio of 12:1 or less. ***(See Corrective Action #2 - Ramps)***
- **Toilet Rooms:** The district must move the current signage from inside the privacy barrier, or add another sign with the universal symbol for accessibility, to the wall by the exterior privacy barrier leading into the boys and girls toilet rooms in the Competition Gym lobby.
- **Toilet Rooms:** The district must enlarge the current 26" wide doors to the accessible stalls in the boys and girls toilet rooms on second floor of the original building to 32" or more.
- **Toilet Rooms:** The district must add a grab bar to the back wall of the accessible stall in the faculty toilet room.
- **Shower Rooms:** The district must remove the 6" lip (barrier) leading into the shower room in the girls PE locker room.
- **Shower Rooms:** The district must add an accessible toilet stall in the girl's PE locker room.

Section IV Comparable Facilities

A. Comparable Facilities

Applicable Requirements: *Guidelines Section VI.D; 34 C.F.R. §106.33*

Summary of Findings and Analysis:

- As part of the walk-through of the high school facility, completed on December 17, 2018, shower room facilities were reviewed for comparability. There was no evidence of violation.

Recommendations:

- There are no recommendations at this time.

Required Corrective Action(s):

- There are no required corrective actions at this time.,

Section V

Services for Students with Disabilities

This section includes a review of the support services, accommodations, and educational programming provided for students with disabilities (Special Education / Section 504)

A. Services for Students with Disabilities

Applicable Requirements: *Guidelines Sections IV.N and VI.A; 34 C.F.R. §§104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130*

Summary of Findings and Analysis:

- The visiting team reviewed materials provided, and information garnered from constituent interviews, to determine if the district is providing Section 504 services to entitled students. **There was evidence of violation: Sections IV.N and VI.A; 34 C.F.R. §§104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130**
 - The current board policy relating to Section 504 has incorrect superintendent contact information.

Recommendations:

- As a result information received during the interview process, the visiting team recommends the district:
 - Create a District and Parent Handbook for Section 504. We encourage you to review other district handbooks and/or the sample handbooks found at this link on the Iowa Department of Education website, for ideas and suggestions: <https://www.educateiowa.gov/section-504>
 - Provide Section 504 training for your named Section 504 coordinator and any other staff the district feels it would benefit from this training. Consider contacting Fred Kinne; edequityconsulting@gmail.com or 563-822-0554 for assistance.

Required Corrective Action(s): *Sections IV.N and VI.A; 34 C.F.R. §§104.4(a) and 104.33-104.36; 28 C.F.R. § 35.130*

- The district must review and correct all contact information in the board policy (102 series) for Section 504.

Section VI Financial Assistance

This section includes equity issues related to administering financial assistance to students.

A. Financial Assistance

Applicable Requirements: *Guidelines Sections VI.B; 34 C.F.R. §§100.3(a) and (b), 104.4(a) and (b), and 106.37*

Summary of Findings and Analysis:

- The visiting team reviewed documents provided them, and information garnered for constituent interviews, to determine if information on honors, awards, and scholarships are available to all persons regardless of race, color, national origin, sex or disability.
There was no evidence of violation.

Recommendations:

- The visiting team recommends the district review the school counselor's link on the district web page to be sure all information (on the initial home page and any links) is accessible in the home languages of constituents needing translation in their native language

Required Corrective Action(s):

- There are no corrective actions at this time.

Section VII Work-Study, Cooperative Programs, and Job Placement

This section includes review of contracts with all employers or other sponsors offering work-study, cooperative education, job placement, and apprenticeship programs and the application materials that students complete to obtain these positions.

A. Work-Study, Cooperative Programs, and Job Placement

Applicable Requirements: *Guidelines Sections VII.A and B, 34 C.F.R. §106.38(a)*

Summary of Findings and Analysis:

- The visiting team reviewed documents provided and information garnered from interviews to determine if the district is providing workplace based education programs. The team determined a workplace based education program was not offered. This section is not applicable. There is no indication of violation.

Recommendations:

- There are no recommendations at this time.

Required Corrective Action(s):

- There are no required corrective actions at this time.

Section VIII Employment

This section includes equity issues related to employment and personnel practices.

A. Employment

Applicable Requirements: *Guidelines Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61*

Summary of Findings and Analysis:

- The visiting team reviewed documents provided by the district, and information garnered from constituent interviews to determine if employment and personnel practices are delivered in a nondiscriminatory manner. **There was evidence of violation: Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61**
 - The nondiscrimination statements contradict each other on the district application provided for review.
 - The equity statement at the end of the application does not name the equity coordinator, with the correct contact information.
 - The district does to have or use a Personnel Hiring Manual.
 - The district does not have or use Personnel Handbooks for both licensed and unlicensed staff
 - The job application forms shared with the team did not include the nondiscrimination statement.

Recommendations:

- The district, as required, uses **Teach Iowa** to post employment opportunities. There was no evidence, from the materials provided by the district, that showed a nondiscrimination statement was part of the application on **Teach Iowa**. The visiting team recommends the district review the protocols of using **Teach Iowa** to be sure the district:
 - Understands that to create a job posting for an open position in **Teach Iowa** there are multiple steps to be completed.
 - the title, location and position description, etc.
 - the pages you want to include in your posting including the required pages: name, address, work history, educational history, and indication that you read the directions
 - Understands the rest of the pages must be selected at the discretion of the posting creator.

- Understands the nondiscrimination statement is a separate page that they must select in order to use it.

Required Corrective Action(s): Sections VIII.A-F; 34 C.F.R. §§104.11-104.14 and 106.51-106.61

- The district must:
 - Review and correct all district application materials to ensure all materials contain:
 - a nondiscrimination notice to include, in addition to the required protected classes (race, color, national origin, sex, disability, age, religion, creed, sexual orientation, and gender identity)
 - information about the grievance procedure and the name and contact information for the district's equity coordinator.
 - Create and use a board approved district Personnel Hiring Manual
 - Create and use a board approved Personnel Handbook for:
 - Licensed staff
 - Unlicensed staff

West Burlington Community School District

Fwd: IDOE-CASA Update on Corrective Actions (Equity) for West Burlington

1 message

Johnson, SueAnn <sueann.johnson@iowa.gov>
 To: Zacchary Foust <zacchary.foust@iowa.gov>

Fri, Dec 6, 2024 at 2:38 PM

----- Forwarded message -----

From: **Johnson, SueAnn** <sueann.johnson@iowa.gov>
 Date: Wed, Oct 25, 2023 at 12:46 PM
 Subject: Re: IDOE-CASA Update on Corrective Actions (Equity) for West Burlington
 To: Lisa Beames <lisa.beames@wbschools.us>

Lisa,

Were you able to upload new photos for the one corrective action I mentioned in the email above? If so, I will be able to review that one this afternoon, as well.

SueAnn

On Wed, Oct 25, 2023 at 11:31 AM Barleen, Robert <robert.barleen@iowa.gov> wrote:
 Hi everyone!

SueAnn, I just got confirmation from Lisa that all four of the remaining Corrective Actions for West Burlington have been successfully updated and are now ready for review. We're all set!

Thanks again!

On Wed, Oct 25, 2023 at 8:57 AM Lisa Beames <lisa.beames@wbschools.us> wrote:

Guys,
 Thanks for your help.

I'm getting ready for and have to attend a meeting here in a little while. I will do my best to get it worked through on our end by the end of the day..if that is OK.

Lisa

On Wed, Oct 25, 2023 at 8:52 AM Barleen, Robert <robert.barleen@iowa.gov> wrote:
 Good morning everyone!

You have impeccable timing, because I was just working on this yesterday with our developer! We've updated a couple of process changes in the back end, but we also discovered what we believe might be the root cause of Lisa's not being able to move the Corrective Actions forward.

Lisa, since you are the superintendent, you can't assign Action Steps to yourself. You will need to assign them to someone else in your district who has a district level Submit role.

The following folks at West Burlington are eligible to edit and submit Action Steps:

Search Results					
	Last Name	First Name	Administrative Organization	Email	Status
Select	Brown	Shawna	West Burlington Ind School District	shawna.brown@wbschools.us	Active
Select	Keane	David	West Burlington Ind School District	david.keane@wbschools.us	Active
Select	Snodgrass	Bruce	West Burlington Ind School District	bruce.snodgrass@wbschools.us	Active
Select	Yeoman	Mark	West Burlington Ind School District	mark.yeoman@wbschools.us	Active

Once these Action Steps are updated and assigned to the other user, they should be able to get in and update the step. We'll know things are back on track if they see the "In Progress" status for the Action Steps. We might need to change some due dates to get everything back on track, but let's see how this goes first.

I have also attached a document that goes through detailed instructions on how the entire process works. Hopefully it will help with getting everything submitted.

Lisa, if you have any questions, please do so by responding to the help ticket. I'll update this info in the ticket as well and will send you an email so you can reply there.

Again, a thousand apologies for the delay in getting this resolved for you guys. The Corrective Actions have a lot of moving parts, and sometimes things get stuck. We'll do our best to get them unstuck and back on track.

Thanks everyone!

--

~Bob Barleen

Education Program Consultant
 Iowa Department of Education
 Grimes State Office Building
 (515) 971-7238
 Email: robert.barleen@iowa.gov



Department of Education

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~Bob Barleen

Education Program Consultant
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 (515) 971-7238
 Email: robert.barleen@iowa.gov



Department of Education

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SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319

Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov

Regular office hours:
Monday - Friday
8:00am - 4:30pm



This communication and any response to it may constitute a public record, and therefore, may be available upon request in accordance with Iowa public records law, Iowa Code Chapter 22.

--
SueAnn D. Johnson
Administrative Consultant, Equity Compliance
Bureau of School Improvement
Iowa Department of Education
Grimes State Office Building
Des Moines, IA 50319
Phone: (515) 336-3942
Email: sueann.johnson@iowa.gov
Website: <https://educateiowa.gov/>



Pre 2022 Community Colleges

Northwest Community College



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

December 9, 2021

Dr. John Hartog, President
Northwest Iowa Community College
603 W Park Street,
Sheldon, IA 51201

Dear President Hartog:

Through recent communication with your team regarding your college's November 2020 equity review, the Iowa Department of Education is pleased to report that staff at Northwest Iowa Community College (NCC) have satisfactorily completed all actions submitted on your Voluntary Compliance Plan (VCP). Therefore, NCC's equity review is considered "closed". However, it should be noted that the United States Department of Education's Office for Civil Rights (OCR) could re-open the file at any time if they have questions regarding any compliance items stated in your original Letter of Finding or VCP. We will inform you if we receive any such inquiries from OCR.

If we can be of further assistance, please do not hesitate to contact the equity team leader, Kelly Friesleben at kelly.friesleben@iowa.gov or 515-868-2847. Our mutual efforts toward achieving excellence and equity in the educational programs offered at NCC, as well as your peer institutions, will serve to improve the quality of life for all Iowans.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Varner".

Jeremy Varner, Administrator
Division of Community Colleges and Workforce Preparation

cc: Erin Latona, Executive Dean of Student & Academic Services, NCC
Renee Carlson, Director – Human Resources, NCC
Laura Nachtigal, Executive Assistant/Board Secretary, NCC
Steve Crew, Administrative Consultant, Bureau of School Improvement
Amy Gieseke, Bureau Chief, Bureau of Community Colleges
Kelly Friesleben, Education Program Consultant, Bureau of Community Colleges

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Phone (515) 281-5294 | www.educateiowa.gov

Iowa Central Community College



IOWA

Department of Education

Ann Lebo, Director

Kim Reynolds, Governor
Adam Gregg, Lt. Governor

January 30, 2023

Dr. Jesse Ulrich, President
Iowa Central Community College
One Triton Circle
Fort Dodge, IA 50501

Dear President Ulrich:

Through recent communication with your team regarding your college's October 2021 equity review, the Iowa Department of Education is pleased to report that staff at Iowa Central Community College (ICCC) have satisfactorily completed all actions submitted on your Voluntary Compliance Plan (VCP). Therefore, ICCC's equity review is considered "closed". However, it should be noted that the United States Department of Education's Office for Civil Rights (OCR) could re-open the file at any time if they have questions regarding any compliance items stated in your original Letter of Finding or VCP. We will inform you if we receive any such inquiries from OCR.

If we can be of further assistance, please do not hesitate to contact the equity team leader, Kelly Friesleben at kelly.friesleben@iowa.gov or 515-868-2847. Our mutual efforts toward achieving excellence and equity in the educational programs offered at NCC, as well as your peer institutions, will serve to improve the quality of life for all Iowans.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeremy Varner".

Jeremy Varner, Administrator
Division of Community Colleges and Workforce Preparation

cc: Stacy Mentzer, Vice President of Instruction, ICCC
Eric Heitz, Administrative Consultant, Bureau of School Improvement
Amy Gieseke, Bureau Chief, Bureau of Community Colleges
Kelly Friesleben, Education Program Consultant, Bureau of Community Colleges

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Phone (515) 281-5294 | www.educateiowa.gov

LEA	Selection Letter Sent	Letter of Findings (LOF) Sent	Number of Corrective Actions	Voluntary Compliance Plan (VCP) Received	Date Closed
Council Bluffs CSD	Data		Data		Data
Davenport CSD	Data		Data		Data
Eddyville-Blakesburg-Fremont CSD					
Lamoni CSD					
Montezuma CSD					
Northwood-Kensett CSD					
Seymour CSD					
Tri-County CSD					
Turkey Valley CSD					
Woodbury Central CSD	Data		Data		Data