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Educational Equity Review Summary

1995-96 School Year

October 1996

Iowa Department of Education
Division of Elementary and Secondary Education
Bureau of Administration, Instruction and School Improvement

It is the policy of the Iowa Department of Education not to discriminate on the basis of race, religion, national origin, sex, age, or disability.

The Department provides civil rights technical assistance to public school districts, nonpublic schools, area education agencies, and community colleges to help them eliminate discrimination in their educational programs, activities, or employment. For assistance, contact the Bureau of Administration, Instruction and School Improvement, Iowa Department of Education.

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Introduction

It is the intent of the Iowa Department of Education to improve the equity of access and delivery of quality instructional programs, services and activities for all Iowans, and to eliminate barriers to achieving educational success based upon race, national origin, gender, language background, disability or socio-economic status. The educational equity review process is one of the ways the Department goes about working toward these goals.

The educational equity review process can produce positive outcomes if it is projected and perceived as an opportunity to examine the status of existing conditions, to identify equity concerns that arise from this examination, to implement strategies to deal with those concerns and to work to implement instructional programs and services that are more inclusive of all Iowans.

Statement Of Purpose: Educational Equity Reviews

The primary purpose of the educational equity review process is to examine state and local educational agency policies and practices for discriminatory exclusion; denial of services; segregation and inequitable treatment or services relative to race, color, national origin, gender, religion, creed, marital status or disability as required by federal and state civil rights laws. In addition, equity related requirements in accreditation standards including the one requiring multicultural, nonsexist approaches to instructional programs are also reviewed. The educational equity monitoring process includes the following activities:

- 1) Collecting and analyzing equity related data;
- 2) Conducting periodic on-site reviews;
- 3) Providing technical assistance through the on-site review visit, follow-up activities and regional workshops and training;
- 4) Reporting annually to the United State Office for Civil Rights.

Educational Equity Review - The Process

The selection of local educational agencies for on-site visits is made using a desk audit conducted annually by Department staff. During the desk audit, data collected by the state is analyzed for indications of equity issues and compliance concerns. The data analyzed includes, but is not limited to, employment trends, course enrollments, building enrollments, advisory committee composition, complaints filed by students, parents, and staff, and/or referrals from staff within state agencies. Because there are still gaps in the Department of Education's Data System in relationship to race and disability, gender data has the greatest impact on district selection. Other factors that are considered in selecting the agencies to be reviewed are the period of time since an agency's last equity review, changing demographics within a district or area, and concerns raised by parents, staff and/or students. The selection process is completed by August 15 each year and notification is sent to all agencies being reviewed by September 5. The on-site reviews are conducted between October

1 and April 30 each year.

All districts operating a high school are part of the selection pool each year unless they have received an on-site visit within the past five years. On-site reviews could be conducted more often if circumstances dictate. School districts which still maintain racially isolated attendance areas receive reviews at least once every five years. The educational agencies to be reviewed are invited to an "Equity Review Orientation" session at which they are familiarized with the review process and effective ways of preparing for it. Agency representatives have an opportunity to ask questions about the reviews and equity issues in general. These orientation sessions have been well attended and they seem to relieve much of the anxiety related to undergoing external reviews.

The on-site visits to school districts are conducted by a team of two to five members depending on the size of the agency to be visited. This is a Department-wide effort coordinated through the Bureau of School Administration, Instruction and School Improvement. Staff members from all the divisions and nearly all the bureaus of the Department are involved as team leaders or team members. During the past two years staff members from area education agencies, colleges, universities and local school districts were included on some reviews. The results have been very positive and it our intent to include staff from outside the Department on reviews when we are able to do so. Team leaders and team members attend a one-half day training session each year. The training is provided by staff within the Bureau of School Administration, Instruction and School Improvement.

The on-site visit includes a thorough review of various materials and policies, interviews with students, staff, administrators, advisory committee members and others, as well as observation of programs and facilities. An exit meeting is held at the close of the review, and a written report of the findings is provided within thirty days of the review. If there are areas of noncompliance, the agency is required to submit a voluntary compliance plan within sixty days of the date of the review findings. The voluntary compliance plans are reviewed by Department staff and the agency receives a response as to the acceptance of their plan. An appeal process is provided should the need arise. A follow-up visit is conducted by the on-site team leader to each agency during the second semester of the year following the on-site visit. The purpose of this visit is to monitor the progress the agency is making toward implementing its voluntary compliance plan and to provide additional technical assistance if needed.

Area Education Agencies

The Educational Equity Review Manuals used for school districts have been adapted into an AEA manual that fits the unique characteristics and roles of the area education agencies. The AEAs are covered by most of the same federal and state equity related laws that cover school districts, but some of these laws may have more direct implications for AEAs than others. The role of the AEA in delivering technical assistance and services can have a major impact on the response of local school districts to equity issues.

For example, the legislation requiring nondiscrimination policies, equity coordinators, grievance procedures, and affirmative action plans apply to the AEAs just as they do to school districts. However, the multicultural, nonsexist education requirement is applied differently to an AEA. Equity review teams look at the technical assistance materials and training done by the agency to see if it is consistent with multicultural, nonsexist standards. The human relations inservice training programs operated by the AEAs are also monitored on the reviews. At least one AEA receives an on-site review each year. The AEA to be reviewed is selected by a desk audit comparison of area-wide data. Other factors that can influence that decision are the time period since an agency's last review, changing demographics within an area and concerns raised by the clients of an agency.

Community Colleges

Just as for area education agencies, there is an Educational Equity Review Manual that has been adapted to the unique characteristics and roles of the community colleges. The community colleges are covered by the same federal civil rights legislation that covers school districts. In some instances the equity related requirements in the school standards do not apply to the community colleges. In those instances, concerns are raised rather than citing noncompliance. At least one community college receives an on-site review each year.

Summary

This Educational Equity Review Summary is based on findings from educational equity on-site reviews of nineteen school districts, one area education agency and one community college during the 1995-96 school year.

It is important to remember that one of the methods used to select the agencies to be reviewed is a desk audit procedure, which is designed to identify educational agencies that have more statistical indicators of potential equity related problems. Other factors that are considered in selecting districts for review are the period of time since their last equity review, changing demographics within a district or area and concerns raised by parents, students, staff or clients. The selection process does not constitute a random sample of Iowa educational agencies.

Also it is important to keep in mind, that although the report makes comparisons between the compliance rates of the districts reviewed from year to year, the comparisons should not be viewed as a longitudinal study of the same districts or should the report findings be generalized to all Iowa school districts.

Each of the nine integrating school districts receive an equity review at least once every five years. These nine districts came under review by the State Board of Education because each had attendance centers that were racially isolated pursuant to State Board guidelines. The area education agency is selected by comparing area-wide data from each of the agency's service areas. The community colleges have all received one equity review over the past fifteen years. The second cycle of community college reviews will begin during the 1996-97 school year. The community colleges will receive reviews in the same order as they did during the first cycle unless data reviews, changing demographics within service areas, or complaints from students, parents or staff indicate a change in order is needed.

The body of the report covers five broad equity categories. They include administrative process requirements related to equity, multicultural, nonsexist education; employment and affirmative action; attendance center integration and accessibility; program integration and accessibility; and student achievement.

The overall compliance rate covering all areas was approximately 78 percent. This is up from last year's overall compliance rate of 70 percent and the 66 percent overall compliance rate of two years ago. The compliance rates went up in nineteen of the areas reviewed. It remained approximately the same as last year in four other areas and went down in ten categories.

The highest compliance rates were found in the following areas: (1) the equitable presentation of scholarships to all students regardless of gender, race, national origin and disability; (2) no significant disparities in dropout rates on the basis of race, gender, national origin or disability; (3) racial integration in attendance centers; (4) board policy development; (5) policies and practices to prevent harassment; (6) the reflection of diversity in textbooks and media center collections; and (7) the inclusion of all students in gifted programs.

The lowest compliance rates were in the areas of: (1) legal notification to parents, students, staff and applicants for employment; (2) language services to limited English proficiency students; (3) affirmative hiring practices; (4) representation of diversity on advisory committees; (5) multicultural, nonsexist education plans; and (6) equity factors in staff evaluation.

There were seven areas where the increase in compliance was up significantly enough to note. They were in the areas of: (1) implementation and use of grievance procedures; (2) affirmative hiring practices; (3) gender inclusive enrollments; (4) accessibility of programs and facilities; (5) multicultural, nonsexist education plans; (6) services to homeless students; and (7) equity factors in staff evaluation.

Educational Equity Reviews - 1995-96 School Year

1. Bedford Community School District
2. Belmond-Klemme Community School District
3. Burlington Community School District
4. Cedar Falls Community School District
5. Diagonal Community School District
6. Eastern Iowa Community College
7. Griswold Community School District
8. Hancock-Avooca Community School District
9. Humboldt Community School District
10. Hudson Community School District
11. IKM Community School District
12. Keystone Area Education Agency
13. North Fayette Community School District
14. North Kossuth Community School District
15. Ottumwa Community School District
16. Spirit Lake Community School District
17. Ventura Community School District
18. Waco Community School District
19. Wellsburg-Steamboat Rock Community School District
20. West Central Community School District
21. West Liberty Community School District

A. Process Requirements Related to Educational Equity

Table A-1: Board Policies on Nondiscrimination

Compliance and Commendations	Compliance with Concerns	Noncompliance
15	4	2

The educational equity review teams look at school board policies when visiting on-site to ascertain if the local school board is setting a positive environment for implementing educational programs free of discrimination. Policies are reviewed to see whether they cover the necessary protected classes (e.g., race, national origin, gender, disability, religion, age, etc.) and to determine if they cover both employment and programs.

Fifteen of the twenty-one agencies visited during the 1995-96 school year were commended for the quality of their policies. Four agencies were in compliance with both federal and state requirements, but had weaknesses in policies for which the teams raised concerns. Two agencies were found to be in noncompliance with the requirements. In these instances their policies either did not cover both employment and program or did not cover the necessary protected classes. The compliance rate of 91 percent was the same as that of the districts reviewed one year ago.

Table A-2: Educational Equity Coordinator

Compliance and Commendations	Compliance with Concerns	Noncompliance
12	6	3

One of the first steps in providing multicultural, nonsexist approaches to the teaching/learning process is to assign responsibility for coordinating the agency's equity related activities. Both federal and state laws require that districts designate such a coordinator. Past educational equity reviews have shown that this step is crucial to effective implementation.

Twelve agencies were commended for having active coordinators who were keeping staff focused on the implementation of equity related objectives. These coordinators were proactive both in implementing inclusive approaches to programming and in taking steps to prevent inequities from occurring. Six other agencies were in compliance with the requirement, but the coordinators were more reactive than proactive. Three agencies were in noncompliance. In these agencies the designation was in name only with little activity actually occurring. The responsibilities of the coordinator were not clearly spelled out; therefore, it was difficult to be held accountable. The compliance rate of 86 percent was up from that of last year.

Table A-3: Civil Rights Related Grievance Procedures

Compliance and Commendations	Compliance with Concerns	Noncompliance
9	6	6

Title IX of the Education Amendments of 1972 (Gender Equity), Section 504 of the Vocational Rehabilitation Act of 1973 (Disability Equity), as well as Chapter 95 of the Iowa Administrative Code (Affirmative Action in Employment), require that local boards adopt grievance procedures for processing complaints of discrimination from parents, students, staff and applicants for employment. Such grievance procedures provide for resolving relatively small conflicts at the local level without involving outside enforcement agencies.

Nine of the agencies reviewed were commended for having strong grievance procedures which were being used. Clients and employees felt that concerns about discrimination and bias were taken seriously. Six agencies were in compliance with this requirement, but had weaknesses in their grievance process. Six agencies were in noncompliance with the requirement. In most instances these districts had grievance procedures, but they either did not cover both program and employment, or they did not cover the necessary protected classes. In these districts, grievance procedures were seldom used. The compliance rate for grievance procedures was 71 percent, up significantly from last year.

Table A-4: Notification

Compliance and Commendations	Compliance with Concerns	Noncompliance
3	3	15

The same federal and state laws that require board policies, equity coordinators and grievance procedures, also require that schools annually notify parents, students, staff, and applicants for employment of these policies, the identity of their equity coordinator and the existence of the grievance procedure. They also require that this information be included in all major annual publications and handbooks. These requirements assume that the policy, the coordinator and the grievance procedure will be ineffective and unutilized if clients are unaware of them.

Three agencies were commended for their notification procedures and for the inclusion of the required information in all of their student, staff and parent handbooks. Three agencies were found to be in compliance, although there were some inconsistencies in the content of their notification. Fifteen agencies were found to be in noncompliance in that they were not meeting the full notification requirements. It is important to understand that these districts were including some notice statement in their publications, but they were not including all of the required information or targeting all the required groups. The compliance rate of 30 percent was down significantly from that of a year ago.

Table A-5: Data Collection

Compliance and Commendations	Compliance with Concerns	Noncompliance
11	2	8

Iowa School Standards require that educational agencies take affirmative steps to integrate students in attendance centers, programs and courses. The standards require that program and course enrollment data be collected on the basis of race, national origin, gender and disability. The rationale for this standard is based on school effectiveness research, which indicates that until educators know what is happening to sub-groups within their building population, it is difficult for them to implement school improvement programs effectively. Collecting and reviewing educational data by race, national origin, gender, disability and socio-economic status gives schools a much more analytical picture of how all students are affected by the programs provided by the school. The educational equity review teams monitor for the collection and use of disaggregated data by educational agencies.

Eleven of the agencies visited during the 1995-96 school year received commendations for the way they were collecting and reviewing disaggregated data. These agencies were using this data as they went through the processes of strategic planning and program evaluation. Two districts were regularly reviewing disaggregated data; however, these districts had not built these factors into their computer systems, and were not using the data in their strategic planning or evaluation processes. This meant the process was more tedious than need be and provided little guarantee that the reviews were being institutionalized. Eight agencies were cited for not regularly collecting or analyzing data in a disaggregated fashion. The compliance rate of 62 percent was up from that of a year ago.

B. Multicultural, Nonsexist Education

Table B-1: Multicultural, Nonsexist Education Plans

Compliance and Commendations	Compliance with Concerns	Noncompliance
1	11	9

The on-site teams also review the multicultural, nonsexist education plans which have been adopted by local educational agencies. These plans are required under Iowa school standards and they are intended to provide the blueprint for building awareness of and respect for diversity throughout the agency's programs. These plans are to include goals and objectives for all program areas, descriptions of staff development efforts, strategies for involving diverse groups in the development and implementation of the plan, the district's plan for infusing the objectives into written curriculum and a strategy for evaluating the implementation of the plan. They are to be updated every five years.

One agency was commended for the quality of its multicultural, nonsexist education plan and its commitment to its plan. Eleven districts' plans had the necessary components, but had weaknesses about which concerns were raised. Nine agencies were in noncompliance because their plans did not contain the necessary components, or their plans were not being implemented. The most frequent reasons for findings of noncompliance were a lack of specific objectives for all program areas, no description or documentation of the staff development provided, or no description of the process for curriculum infusion. The compliance rate of 57 percent was up significantly from last year.

Table B-2: Infusion of Multicultural, Nonsexist Concepts Into Written Curriculum

Compliance and Commendations	Compliance with Concerns	Noncompliance
3	12	6

A major thrust of the multicultural, nonsexist education plan is to provide a link to the curriculum development process through the description of the infusion process and the development of objectives for each program area. Written curriculum guides in the agencies are reviewed to see whether they reflect the objectives indicated in the multicultural, nonsexist education plan. Guides from the two most recently revised curricula are reviewed on each visit.

Three of the local education agencies visited were commended for the leadership they were providing in the infusion process. Written curriculum in these districts reflected the contributions and perspectives of diverse racial/cultural groups as well as both men and women. Twelve other districts were in compliance with the requirement, but concerns were raised about one or more weaknesses. Six agencies were in noncompliance with the requirement and written curriculum did not consistently reflect multicultural, nonsexist concepts. There had been efforts to diversify the curriculum in these districts, but their efforts were not effective. The compliance rate for curriculum infusion was 71 percent, which was up slightly from last year.

Table B-3: Texts and Instructional Materials

Compliance and Commendations	Compliance with Concerns	Noncompliance
13	5	3

If multicultural, nonsexist approaches to educational programs are to be implemented, it is important that the texts and materials used in the classroom reflect the contributions and perspectives of diverse racial/ethnic groups as well as both women and men. These criteria should be clearly spelled out in board policies related to the adoption of the selection and adoption of instructional materials. Administrative steps should be taken to ensure that curriculum committees involved in textbook adoption utilize the adopted board criteria.

Thirteen of the educational agencies reviewed were in compliance or commended for the inclusion of equity related criteria in their textbook adoption policies. The textbooks reviewed in these districts met those criteria. Five agencies were in compliance, but still had one or more texts that did not meet their own criteria. Three districts were cited for noncompliance because the board policy on textbook adoption did not include equity related criteria and the texts reviewed during the equity review were not reflective of multicultural, nonsexist approaches. The compliance rate of 86 percent was down slightly from a year ago.

Table B-4: Media Programs

Compliance and Commendations	Compliance with Concerns	Noncompliance
12	7	2

Multicultural, nonsexist approaches are to be used across the total school program. One area outside the "traditional" curricula which plays a key role in exposing students and staff to cultural and other forms of diversity is the school media program. Iowa school standards require that there be a written curriculum to build student skills for utilizing media resources and that media collections foster gender fair, multicultural approaches to curriculum studies.

Twelve agencies were commended for maintaining strong media programs and curriculum which reflected diversity and were inclusive of equity concepts. Seven agencies were found to be in compliance although concerns were raised regarding weaknesses in their programs. Two agencies were found to be in noncompliance. These districts had collections with high proportions of pre 1975 copyright materials, that did not reflect the cultural diversity of America, or the roles open to both men and women in today's society. The compliance rate of 90 percent was down slightly from that of a year ago.

Table B-5: Guidance Programs

Compliance and Commendations	Compliance with Concerns	Noncompliance
8	8	5

The guidance program is another key component in a district's equity program. Because of their unique roles in school districts, counselors play a pivotal role in helping districts identify equity related problems and in facilitating solutions to them. They should have a comprehensive perspective on course enrollment and achievement trends throughout the district and can alert teachers and administrators to problematic trends before they become systemic problems.

Eight agencies were commended for maintaining guidance programs which helped students reduce stereotypes of themselves and others. These districts had a K-12 guidance curriculum which was inclusive of diversity, which regularly reviewed enrollments in courses and programs to see if all students were getting involved, and which also regularly reviewed guidance policies and practices when gender typed or racially isolated enrollment patterns were identified. Eight agencies met the requirements, but had weaknesses for which concerns were raised. Five agencies were cited for not being in compliance with the requirements. In most instances the citations were issued because agency guidance programs were not disaggregating basic data to determine where patterns

of segregation were emerging, or because policies and practices were not reviewed when such patterns were discovered. The compliance rate of 76 percent was down slightly from last year.

Table B-6: Athletic Logos and Mascots

Compliance and Commendations	Compliance with Concerns	Noncompliance
16	4	1

An issue closely related to extracurricular activities is one of athletic team mascots which are stereotyped in nature or which reinforce negative stereotypes about groups of people. In Iowa this most often takes one of three forms. The first is the use of American Indian related names and mascots, the second is the use of the Confederate flag as an athletic logo, and the third is the use of diminutive terms or suffixes to the names of girls' teams which imply that they are an appendage to the boys' programs.

Sixteen agencies were commended for having mascots and logos free of stereotypical implications. Four districts were in compliance, but concerns were raised in terms of diminutive gender inferences ethnic stereotyping in team logos. One district was cited for maintaining athletic logos and mascots that reinforced student stereotypes of a racial/ethnic group or which might be offensive to an ethnic group. The 95 percent compliance rate was up slightly that of last year.

Table B-7: Language Services to Limited English Proficiency Students

Compliance and Commendations	Compliance with Concerns	Noncompliance
3	5	13

Both federal and state legislation requires school districts to provide language assistance to students whose primary language is one other than English. All districts are required to identify the home (primary) language of students when they first enter the school district. If the student's home language is one other than English, the district is required to measure the student's oral and written language proficiency to ensure that the student has the English skills necessary to successfully function in the classroom. If the language assessment tests administered determine that the student needs language assistance, the district is required to provide needed English language assistance and support services. These programs could take one of several forms including bilingual education, English as a Second Language and language tutoring services. Once the program is established, criteria for exiting the program must be established and evaluation criteria developed.

Three of the educational agencies visited were commended for their programs for providing

language assistance to limited English proficiency students. Five other agencies were in compliance with the requirements, but had concerns raised about weaknesses in their services. Thirteen agencies were cited for not taking the necessary steps to adequately provide language assistance to these students. The primary reason for the citations was that districts were not identifying the home language of the students upon their admission to the school district. A few school districts were not doing the necessary language proficiency testing after they knew that students came from homes where the primary language was one other than English. These districts were providing some language assistance to some students, but this often began after the students experienced problems and failure for a significant period of time, or the district was not serving all the students who had needs. This area remains problematic across the state, and the rate of compliance (38%) was down significantly from last year.

Table B-8: Harassment of Staff and Students

Compliance and Commendations	Compliance with Concerns	Noncompliance
9	11	1

Sexual harassment of staff or students, and harassment based upon their race, national origin, disability, gender, or religion has been ruled a form of discrimination by the Supreme Court. This includes harassment by administrators, fellow employees or students. There have been several highly visible incidents of hate crimes and harassment in Iowa schools over the past five years. Over the past four years Department equity staff have received more requests for assistance, information, and training and provided more assistance and training on this topic than any other.

Nine agencies visited received were in compliance or received commendations for their efforts to prevent harassment. Eleven agencies had some form of board policy on harassment, but the equity review teams raised concerns about limitations in these policies, and how they were being implemented. One agency was cited for noncompliance for not having preventative measures in place. The most common concern of the equity review teams were that some policies still covered sexual harassment only, but did not include racial, religious or other forms of harassment. Some districts that have board policies on student harassment have not yet infused the policy into their discipline codes. Others had policies in place, but administrators had not received training in how to handle harassment complaints. There has been a very significant improvement in this area each of the last two years. The current 95 percent compliance rate compares to a compliance rate of 21 percent just three years ago.

C. Diverse Role Models: Employment and Affirmative Action

Table C-1: Employment Policies

Compliance and Commendations	Compliance with Concerns	Noncompliance
15	5	1

School boards set the climate for the implementation of open and fair employment practices. Their policies either reflect their concern for the provision of diverse role models for students, or a lack of that concern. Both federal and state laws require that school boards adopt nondiscrimination policies for employment and inform employees and applicants for employment of that policy. During the course of the on-site reviews, the district's employment and personnel policies are reviewed to ensure that they are consistent with federal and state nondiscrimination laws. Recruitment, application, interview and placement policies are among those reviewed.

Fifteen agencies had strong board policies on nondiscrimination in employment. Five agencies were in compliance with the requirement, but had weaknesses in the implementation of their policies. One agency was cited for noncompliance. The compliance rate of 95 percent was down slightly from a year ago.

Table C-2: Employment Practices

Compliance and Commendations	Compliance with Concerns	Noncompliance
11	6	4

During the course of the equity review process employment practices are reviewed to ensure that they are consistent with the nondiscrimination policy of the agency. This involves reviewing employment application materials, recruitment materials, the process used for interviewing applicants, as well as personnel practices related to job placement and staff reduction.

Eleven agencies visited were in compliance or received commendation for the inclusiveness of their employment practices. Six agencies were in compliance, but received recommendations for strengthening their employment practices from an equity related perspective. Four agencies were cited for noncompliance. These citations usually involved illegal inquiries on application forms, and lack of structure or accountability in the interview process. The 81 percent compliance rate was up slightly from that of one year ago.

Table C-3: Affirmative Action Plans

Compliance and Commendations	Compliance with Concerns	Noncompliance
3	8	10

Iowa law requires that educational agencies do more than avoid discrimination in their employment policies and practices. Chapter 19B.11 of the Iowa Code requires school districts, area education agencies and community colleges to adopt and implement affirmative action plans and strategies for recruiting and employing persons from diverse racial/ethnic groups, women and men, as well as persons with disabilities when they are under-represented in various job categories within the current workforce.

Three agencies were commended on the quality of their affirmative action plan and their efforts to diversify their workforce. Eight agencies had adopted acceptable affirmative action plans, but exhibited weaknesses in their efforts to implement the plan. Ten agencies were cited for having inadequate affirmative action plans. The most common deficiencies in these plans were: (1) lack of training for supervisory employees on implementing equal employment opportunity and affirmative action plans; (2) lack of numerical hiring goals for specific job categories; (3) lack of documentation of a self-evaluation of current employment practices; or (4) failure to update the plan every two years. The compliance rate of 52 percent was up significantly from that of the agencies reviewed one year ago.

Under-representation of women in administration, men in elementary teaching positions, and persons from diverse racial/ethnic groups in both certified and classified positions continues to be pervasive statewide. Factors that contribute to this lack of diversity are the declining enrollment trends over the past ten years, collective bargaining agreements with over-emphasis on seniority, which often place the security of current staff over the needs of students. These factors tend to jeopardize the jobs of female administrators and minority employees who often tend to be lower on the tenure list. This is exacerbated by the low number of minority students in educator preparation institutions in the state. The increase in numbers of students from diverse racial/ethnic backgrounds coupled with the lack of racial/ethnic diversity on staff is continuing to create severe problems in a number of school districts in Iowa.

Table C-4: Advisory Committee Membership

Compliance and Commendations	Compliance with Concerns	Noncompliance
4	7	10

Equity review teams scrutinize the makeup of advisory committees utilized by school districts to ensure that they are including both men and women, persons from diverse racial/ethnic groups and persons with disabilities in an equitable manner. This is especially important in Iowa educational agencies where there are few women in administrative positions and little cultural diversity on staff. The closest scrutiny was applied to multicultural, nonsexist education, vocational education, curriculum and 280.12 needs assessment advisory committees.

Four agencies were commended for having diversity and gender balance reflected on their advisory committees. Seven agencies were in compliance with requirements, but concerns were raised about the districts' support and coordination of advisory committee activities. Ten agencies were cited for non-compliance because they reflected little diversity on their advisory committees. The compliance rate of 52 percent was down significantly from last year.

Table C-5: Staff Evaluation

Compliance and Commendations	Compliance with Concerns	Noncompliance
12	9	0

The quality and content of staff evaluation systems have a significant impact on the implementation of inclusive approaches by administrators, teachers and classified staff in educational agencies. When equity criteria are visibly included in staff evaluation, staff members who are sensitive to the needs of diverse students are reinforced for their efforts, and those who implement less than inclusive approaches are given the message that such approaches are essential to being an effective educator in Iowa schools.

Iowa schools are required to establish a system for evaluating their employees. However, the law does not specify what criteria will be used in the evaluation process. For this reason the number of agencies in the noncompliance column above is zero. Twelve agencies reviewed received commendation for visibly including equity criteria in the evaluation of its employees. Concerns were raised in nine agencies over the lack of equity criteria in staff evaluation procedures. Although this record is not good, it constitutes a slight increase for the third year in a row in the number of districts that included equity components in their staff evaluation system. The lack of an equity component in evaluation is one key reason why some school districts never translate their multicultural, nonsexist education and affirmative action plans into effective action.

D. Attendance Center Integration and Physical Accessibility

Table D-1: Racial Integration of Attendance Centers

Compliance and Commendations	Compliance with Concerns	Noncompliance
20	1	0

Iowa school standards require that school districts take affirmative steps to integrate students in attendance centers on the basis of race, national origin, gender and disability. Racial isolation in attendance centers was not a major issue in any of the twenty-one agencies reviewed. None of the school districts visited operated attendance centers with racially isolated enrollments (20% points above the district-wide percentage of African American, Hispanic American, Asian American, and American Indian students).

Of the districts visited only the Burlington School District had ever maintained a racially isolated attendance center. The Burlington District submitted a desegregation plan to the State Board of Education in 1977, which resulted in the pairing of Salter and Grimes Elementary Schools. The pairing eliminated the racial isolation and all the attendance centers in the district have remained racially integrated since that time. The West Liberty School District is the most racially and ethnically diverse district in Iowa. At the time of the visit minority students made up 34 percent of the student population. The demographic characteristics of each of the attendance centers reflects that of the district as a whole. There was some concern that open enrollment trends may be contributing to the gap in racial/ethnic diversity between the West Liberty School District and its neighbors. Under open enrollment fifty-eight students enrolled outside the school district and fourteen students enrolled into the school district. All fifty-eight students open enrolling out of the district are white (non-Hispanic) students. Of the fourteen students open enrolling into the district, two are Hispanic. It is recommended that the West Liberty School District closely monitor future open enrollment trends and work with its neighboring districts to develop joint strategies to prevent future open enrollment requests so that they do not lead to a greater gap in diversity between the districts.

None of the twenty-one agencies reviewed operated attendance centers which were illegally gender segregated, or segregated on the basis of disability. The compliance rate of 100 percent was up slightly from that of the districts reviewed during the 1994-95 school year.

Table D-2: Physical Accessibility

Compliance and Commendations	Compliance with Concerns	Noncompliance
14	3	4

A primary issue related to disability integration is the accessibility of facilities, programs and activities to students, staff, parents and community members with disabilities. Section 504 of the Vocational Rehabilitation Act of 1973, and the more recent Americans With Disability Act of 1992, require that all programs and services be accessible to persons with disabilities. This does not mean that every building must be barrier free. Where architectural changes were the only way to provide accessibility to district programs and services those changes were to have been made by the end of 1985. If there are architectural barriers still remaining, and physical remodeling is not currently underway as the remedy, the agency must have a written plan outlining how all programs and services are being made accessible.

During the 1995-1996 educational equity review visits, fourteen agencies were commended for the actions they had taken to make their facilities and programs accessible. Three agencies were in compliance with the requirements, but had weaknesses in their delivery system. Four agencies still maintained facilities with physical barriers and had no written plan for making their programs, activities, and services accessible. Physical inaccessibility remains a problem in some smaller, rural Iowa school districts with facilities built prior to 1973 and which have enrollments of fewer than 500 students. However, the compliance rate of 81 percent for accessibility was significantly higher for the third straight year.

E. Program Integration and Accessibility

E: Integration in Programs, Courses and Activities

For the purposes of equity monitoring, gender typed classes are defined as those where either males or females make up 80 percent or more of the participants in the program, course or activity. Segregation on the basis of race and disability is defined as when the combined percentage of African American, Hispanic American, Asian American and American Indian students varies more than 10 percent from the percentage of those combined groups in the school district or community college. The standard for disability segregation is the same as for race. A citation occurs when segregation as defined above is present, and the agency has not reviewed their program policies and practices to determine if they contribute to this segregation, or if they have failed to target information about the program to the groups of students who have not been involved. If these two steps are being taken, the school or agency is not cited.

Table E-1: Racial Integration

Compliance and Commendations	Compliance with Concerns	Noncompliance
21	0	0

All twenty-one agencies either received commendations for their efforts for integrating students from diverse racial/ethnic groups into programs, courses and activities, or they did not have significant numbers of students from diverse racial/ethnic backgrounds for this to be an issue or were in basic compliance.

Table E-2: Gender Integration

Compliance and Commendations	Compliance with Concerns	Noncompliance
12	4	5

Twelve agencies were commended for their efforts to integrate both males and females into all their programs, courses and activities. Four agencies were in compliance with Title IX requirements, but still had gender typed enrollments in some programs. Five agencies were cited for noncompliance because they had sex typed enrollments in one or more program areas, and they had not reviewed their policies and practices to see if they were contributing to the gender segregation, nor had they taken steps to target program information toward students who had not historically been involved.

Gender typed enrollments are still pervasive in some vocational programs across the state of Iowa, especially in the area of industrial technology programs and courses. Other program areas cited were agricultural education, family and consumer science, music/chorus, and physics programs. The positive news is the 76 percent compliance is up significantly for the third straight year.

Table E-3: Disability Integration

Compliance and Commendations	Compliance with Concerns	Noncompliance
19	1	1

Nineteen of the agencies reviewed were commended on their efforts to integrate students with disabilities into all programs, courses and activities. One agency was found to be in compliance with disability integration standards, but received recommendations for strengthening its efforts. Concerns were related to the lack of involvement of students with disabilities in extracurricular programs or for not meeting the least restrictive environment clause of Section 504. The 90 percent compliance rate was up slightly from a year ago.

Table E-4: Talented and Gifted Programs

Compliance and Commendations	Compliance with Concerns	Noncompliance
17	3	1

Iowa school standards require the provision of differentiated programming for gifted and talented students. In an effort to provide equitable access to these programs, the standards require that schools use multiple criteria for identifying gifted students and not rely heavily on standardized and IQ test scores. Districts must take affirmative steps to include students from diverse racial/ethnic groups in their gifted programs.

Seventeen districts reviewed were commended on their efforts to include students from diverse groups in their gifted programs. Three districts were in compliance with the requirement, but received recommendations for broadening accessibility, or strengthening their program. One district was cited for noncompliance. They were not using multiple criteria for identifying gifted students or relying heavily on standardized and IQ test data. They were not implementing strategies for including students from diverse groups into their programs. The 95 percent compliance rate was up slightly for the third year in a row.

Table E-5: Special Education

Compliance and Commendations	Compliance with Concerns	Noncompliance
17	2	2

Historically there has been an over-representation of minority students and males in special education programs. This has been true nationwide and in some Iowa school districts. The same standards related to segregation apply as in other program areas. Agencies must review policies and practices to determine whether they are contributing to the enrollment trends and if so to change those policies and practices.

Seventeen educational agencies were commended for their efforts to equitably serve all students in their special education programs. Enrollments in their special education programs generally reflected those of their student populations. Two agencies were found to be in compliance with nondiscrimination standards, but concerns were raised about gender or race typed enrollments. Two agencies were cited for having gender or race typed enrollments and not having done the required review of policies and practices and/or not taking strategies to change these enrollment patterns. The 90 percent compliance rate was up slightly from one year ago.

Table E-6: Extracurricular Activities

Compliance and Commendations	Compliance with Concerns	Noncompliance
14	4	3

Just as integration is an issue for the classroom, so it is also an issue for co-curricular activities. A very powerful indicator of how comfortable students feel about collaborating with students of the other gender, persons from other racial/ethnic groups and persons with disabilities is the degree to which diverse racial/ethnic groups, both males and females and students with disabilities are involved together in extracurricular activities.

Fourteen educational agencies were in compliance or commended for their effective involvement of all groups of students in their extracurricular programs. Four agencies were in compliance with the law, but often had weaknesses in the way they disseminated information to students about extracurricular opportunities. Three agencies were cited for maintaining segregated extracurricular activities. The areas cited included chorus, cheerleading, band, athletics and the school newspaper. The 86 percent compliance rate was up significantly from last year.

Table E-7: Implementation of At-Risk Education Programs

Compliance and Commendations	Compliance with Concerns	Noncompliance
8	6	7

Iowa school districts are required to have board adopted programs to serve students who may be at a high risk of failure or dropping out of school. The purpose of these plans is to identify these students as early as possible and implement individualized intervention strategies. Eight of the educational agencies reviewed were either in compliance or commended for the quality of their at-risk plans and their implementation of those plans. Six agencies were in compliance with the requirements, but had one or more weaknesses in their plans or the implementation of those plans. Seven districts were cited for non-compliance either because their board had not adopted an at-risk plan or the staff members were not implementing the plan adopted. The 67 percent compliance rate was down slightly from that of the districts reviewed during the 1994-95 school year.

Table E-8: Services to Homeless Students

Compliance and Commendations	Compliance with Concerns	Noncompliance
8	6	7

Federal law requires that school districts provide educational services to homeless children who may have no permanent or temporary residential address. The emphasis of this requirement is to provide outreach, information and notification in places and agencies where the homeless may congregate in search of assistance and review policies and practices which may serve as a barrier to the enrollment and educating of homeless youth. Eight of the educational agencies reviewed were in compliance or commended for their efforts to serve homeless students. Six agencies were in compliance, but received recommendations for strengthening their efforts. Seven agencies were cited for noncompliance with this requirement. The 66 percent compliance rate is a significant increase from that of one year ago.

F. Student Achievement

For the purposes of this report, student achievement will be assessed by the extent that districts are reviewing disaggregated data on standardized tests and other assessment strategies, reception of scholarships and awards, enrollment in upper level courses, dropout rates and student discipline. Looking at this information regarding groups of students gives a fairly meaningful assessment of their success or lack of success in the school environment.

Table F-1: Standardized Achievement Tests

Compliance and Commendations	Compliance with Concerns	Noncompliance
10	7	4

Iowa schools are required to identify what they want their students to know and be able to do as a result of their educational program. They are expected to report their progress on achieving these goals on an annual basis to the clients of their community. Educational agencies are wary about how the information will be used and are often reluctant to collect or release the data in a disaggregated format. During the course of the educational equity reviews, we request the average grade level equivalency by gender and by racial/ethnic group at the fifth and tenth grade for reading comprehension and math problem solving.

Ten agencies were commended for providing the information requested and giving evidence that they were using the information in needs assessment and strategic planning. Seven agencies provided the information, but there was no evidence that they were consistently making use of it in their school improvement activities. Four agencies were cited for not collecting this information in a disaggregated fashion. The 81 percent compliance rate is up significantly from that of a year ago.

Table F-2: Suspensions and Expulsions

Compliance and Commendations	Compliance with Concerns	Noncompliance
15	2	4

Student suspensions and expulsions are rather explicit indicators of student problems in a school system or that the system is not working for the student. Members of educational equity review teams review discipline policies for factors that may create bias in the system and review suspension and expulsion rates on a disaggregated basis.

Fifteen agencies were commended for their efforts to develop unbiased discipline systems and for suspension rates which reflected equitably the student population of their school district. Two agencies were found to be in compliance with nondiscrimination requirements, but concerns were raised because there were still significant disparities between the suspension rates of male and female students and students from diverse racial/ethnic groups. Another common weakness was that student discipline codes did not speak to the issue of student intolerance toward one another based upon their race, gender, disability or religion. Four agencies were cited for having disparate rates of suspension for students based upon race, gender and disability without having taken significant steps to review policies and practices to see if they may be contributing to the disparity, and without taking steps to intervene in a preventative way. The compliance rate of 81 percent was down slightly from last year.

Table F-3: Dropout Rates

Compliance and Commendations	Compliance with Concerns	Noncompliance
21	0	0

When a student drops out of school with no intentions of enrolling in an alternative educational institution, there are significant costs to society. Educational agencies with excessively high dropout rates or in which members of student subgroup populations dropout in disproportionately high numbers have an obligation to review policies, practices and programs to ensure that they are not contributing to the high dropout rate, and to develop intervention strategies to reduce those rates. Disaggregated dropout data is reviewed by equity review teams as well as the intervention strategies used by the agency to eliminate or reduce dropouts.

In all of the twenty-one educational agencies reviewed, the demographic characteristics of those students that had dropped out, reflected the demographics of the student population at large. The 100 percent compliance rate was up from that of last year.

Table F-4: Scholarship and Awards

Compliance and Commendations	Compliance with Concerns	Noncompliance
21	0	0

It is a good sign when the students in an educational agency who receive scholarships reflect the demographic makeup of the school as a whole. For this reason equity review teams scrutinize the lists of such awards given out in the year previous to the visit. All twenty-one of the agencies reviewed were in compliance or commended for recognizing excellence in students from diverse racial/ethnic groups as well as both males and females and students with disabilities. The 100 percent compliance rate was up from that of a year ago.

Table F-5: Enrollment in Upper Level Courses

Compliance and Commendations	Compliance with Concerns	Noncompliance
18	2	1

Eighteen agencies reviewed were in compliance or commended for their efforts to involve all students in more advanced upper level courses in mathematics, science, language arts, and social studies. Two agencies were found to be in compliance with nondiscrimination requirements, but received recommendations on how they might be more inclusive. One district was cited for the lack of involvement of minority students and females in upper level math and science courses. The 95 percent compliance rate was down slightly from that of one year ago.

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