

**Areas of Non-Compliance**  
**Keokuk Community School District's Plan of Action**  
**Site Visit Date: April 2009**

Submitted by: Lora Wolff, Superintendent

Date Submitted: 7/20/2009

Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
EQ4. Data regarding district, attendance center, and course enrollment on the basis of gender, disability, race, and/or national origin do not exist for all subgroups. 281—IAC 12.1(1)	No three-year trend data No system for data collection Not all building data represented	Each year building principals and staff will review attendance center data and course enrollment data on the basis of gender, disability, race, and/or national origin. That data will be aggregate to the district level. A form has been created for this data analysis (included in this report).	Annually (November or December)
BH1. Policy on harassment, bullying, and hazing of or by students and staff and volunteers on the basis of age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or family status 281—IAC 12.3(13), Title IX, Section 106.31, and Code of Iowa, Chapter 729A.1, and SF 61	Policies do not include all protected traits or characteristics. (Policies 410.4 and 502.11)	The KCSB Board of Education will review the two policies not in compliance and make modifications (marital status was inadvertently left off the policies). Upon adoption of the revised policies, policies will be sent to Barb Byrd (Site Visit Chair).	Initial Reading of Board Policy 410.4 and 502.11—August 10, 2009. Second Reading of Board Policy 410.4 and 502.11—August 24, 2009.

<p>GT5. The district has no differentiated program for identified gifted and talented students. 281— IAC 12.5(12)</p>	<p>No evidence provided of addressing affective needs of students K-12.</p>	<p>In order to address the affective needs of the gifted and talented students, a clear definition of what is meant by "affective needs." Initial research on this topic states that the affective focuses on attitudes, motivation, and values. Further research needs to be done to determine the coordination between the cognitive needs and the affective needs of the talented and gifted students. One this has been determined, addressing these needs should be part of the overall comprehensive review of the district's TAG program. One suggestion from elsewhere in this site visit report is the possibility would be to provide a homeroom consisting of talented and gifted students so they would have the opportunity to discuss issues and post-secondary plans.</p>	<p>June 2010</p>
<p>PE8. No evidence exists for the annual evaluation of administrators. 281—IAC 12.3(3) and Iowa Code 279. 23A</p>	<p>No evidence provided the administrator's evaluator meets annually with the administrator to review progress on the administrator's professional development plan or assess the goals of the individual administrator's professional development plan.</p>	<p>Action 1: A spreadsheet will be developed to clearly track when the evaluator and administrator meet to review progress on the administrator's professional development plan and/or to assess the administrator's and building's goals. Action 2: Each administrator will be evaluated annually (See attached forms developed and used during 2008-2009 and beyond).</p>	<p>Meeting 1: Fall Meeting 2: Prior to May 1</p>

<p>SCP3. The district-counseling program is not regularly reviewed and revised. 281-IAC 12.3(11)</p> <p>SCP4. The district counseling program is not designed to provide curriculum that is embedded throughout the district's overall curriculum. 281-IAC 12.3(11)</p> <p>SCP5. The district counseling program is not designed to provide individual student planning designed to help students establish educational and career goals. 281-IAC 12.3(11)</p> <p>SCP6. The district counseling program is not designed to provide responsive services through intervention and curriculum that meet students' immediate and future needs. 281-IAC 12.3(11)</p> <p>SCP7. The district counseling program is not designed to provide management activities that establish, maintain, and enhance the total school counseling program. 281-IAC 12.3(11)</p>	<p>No evidence provided for K-5 counseling program</p>	<p>The district wrote and was awarded an Elementary and Secondary Guidance Counselor grant (April 2009). Four elementary guidance counselors have been hired along with a Dean of Students (social worker). Psychologist services will be provided through contracted services. The team has had its first organizational meeting (July 2009). Documentation is included with this non-compliance plan relating to the outcomes for the grant and how we intend to provide a K-5 guidance program for our students.</p>	<p>2009-2010; Work to provide a K-5 guidance program is well underway</p>
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<p>LP3. The district library program is not regularly reviewed and revised and designed. 281—IAC 12.3(12)</p> <p>LP3.1. The district library program is not designed to provide methods to improve library collections to meet student and staff needs. 281—IAC 12.3(12)</p> <p>LP3.2. The district library program is not designed to provide connections with parents and the community. 281—IAC 12.3(12)</p> <p>LP3.3. The district library program is not designed to provide support for the district's school improvement plan. 281—IAC 12.3(12)</p> <p>LP3.4. The district library program is not designed to provide access to or support for professional development for the teacher librarian. 281—IAC 12.3(12)</p> <p>LP3.5. The district library program is not designed to provide current technology and electronic resources. 281—IAC 12.3(12)</p> <p>LP3.6. The district library program is not designed to provide current and diverse collection of fiction and nonfiction materials in a variety of formats. 281—IAC 12.3(12)</p> <p>LP3.7. The district library program is not designed to provide a plan for annually updating and replacing library materials, supports, and equipment. 281—IAC 12.3(12)</p>	<p>No evidence provided of a library plan</p>	<p>The district contains a large number of documents relating to our media centers. However, they are separate documents rather than one compiled library plan. Our task will be to incorporate all our documents into one plan.</p> <p>Action 1: Secure sample library plans from other districts.</p> <p>Action 2: Create a Table of Contents for our library plan</p> <p>Action 3: Create a library plan for the district.</p>	<p>June 2010</p>
<p>HSPH2. The health program for grades 9-12 does not contain one unit. 281—IAC 12.5(5)(e)</p>		<p>Beginning with the 2009-2010 school year, the district will teach one unit at health rather than ½ unit as occurred in previous years.</p>	<p>Fall 2009</p>

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Submitted by: Lora Wolff, Superintendent

Date Submitted: 7/20/2009

Outside of Chapter 12 Non-compliance Issues	Additional Details	Plan of Correction	Timeline for Completion
EQD1. The district does not have a policy on non-discrimination in employment on the basis of race, color, national origin, gender, disability, religion, creed, marital status, sexual orientation, and gender identity (EQD1). Title IX 34CFR 106.9 Section 504 34 CFR 104.8 and Iowa Code 216.6	Not all protected classes included in board policy.	<p>Regarding "marital status." This is not required by DE monitoring, but the District should note that the Office of Civil Rights (OCR) or another agency could cite the District as noncompliant.</p> <p>The KCSD Board of Education will review the two policies not in compliance and make modifications (marital status was inadvertently left off the policies). Upon adoption of the revised policies, policies will be sent to Barb Byrd (Site Visit Chair).</p>	Initial Reading of Board Policy 410.4 and 502.11—August 10, 2009. Second Reading of Board Policy 410.4 and 502.11—August 24, 2009.
EQD3. The district does not have a nondiscrimination notification in major written publications: Parent, student, employee handbook, Registration handbook, Coaches handbooks, Brochures about the district, Web site, and School newsletters Section 504 34 CFR 104.8 Title IX 34 CFR 106.9, OCR Guidelines N.O and V.C.	The district's policy statements on non-discrimination do not consistently include all required protected classes.	As all materials and documents (handbooks—parent, student, coaches, and employee; brochures, newsletters, and the district website) are reviewed special consideration will be taken to ensure that the nondiscrimination notification is included.	Ongoing as publications are reviewed and updated

<p>EQD4. The district does not have a plan that addresses equal employment opportunity and affirmative action in employment. Iowa Code 19B.11, 281—IAC Chapter 95</p>	<p>District policy provided; no evidence provided of EEO plan</p>	<p>Action 1: Secure copies of other EEO plans from other districts Action 2: Develop an EEO plan for the district</p>	<p>June 2010</p>
<p>T4A1. A crisis management plan and security procedures for the time when students are at school and on their way to and from school do not exit. Title IV-A, NCLBA Sec. 4114(d)(7)(B) and Title IV-A, NCLBA Sec. 4114(d)(7)(D)</p>	<p>No evidence provided of procedures for the time when students are on their way to and from school.</p>	<p>Action 1: Secure copies of what other districts are using for procedures for the time when students are on their way to and from school. Action 2: Review the district's crises management plan and make revisions Action 3: Include information for security procedures for the time when students are on their way to and from school.</p>	<p>June 2010</p>