DPI
Pupil Nondiscrimination Self-Evaluation Report:

***Complete Self Evaluation Report and Related Requirements**
DATE: 6/24/2024

SCHOOL DISTRICT OF WISCONSIN DELLS

DPI PUPIL NONDISCRIMINATION SELF-EVALUATION REPORT:

June 24, 2024
Complete Self-Evaluation Report and Related Requirements

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Section I - General Overview of PI-9 Pupil Nondiscrimination

The self-evaluation required by PI 9.06, Wis. Admin. Code, is more than a legal requirement. It is an invaluable tool that can be used to strengthen our commitment and efforts to foster equitable and successful schools for all students.

Cycle I: Between 1989 and 1994, Wisconsin school districts evaluated the status of pupil nondiscrimination and equality of educational opportunity within their own districts and then reported on their evaluation to the Department of Public Instruction. This process is called Cycle I. **Cycle I focused primarily on whether compliance had been achieved with the procedural requirements established under s. 118.13, Stats., Wisconsin's pupil nondiscrimination law.**

Cycle II: In 2000-2001, districts were required to conduct a second self-evaluation, which was referred to as Cycle II. **The Cycle II evaluation required more than an assessment of whether compliance has been achieved with the procedural requirements of the law.** In Cycle II, school districts were asked to assess the effectiveness of their efforts in achieving pupil nondiscrimination and equality of educational opportunity.

Cycle III: In 2006-2007, districts were required to complete Cycle III of the self-evaluation. **Reporting requirements under Cycle III were much different** than under Cycle I or II because of a detailed data analysis conducted by the department. Cycle III required districts to evaluate these three elements, create an evaluation report, and assure the department of their work:

- "Methods, practices, curriculum, and materials used in … counseling…"
- "Trends and patterns in awarding scholarships and other forms of recognition and achievement provided or administered by the school district"
- "Participation trends and patterns and school district support of athletic, extracurricular and recreational activities"

Cycle IV: In 2011-12, districts were again required to complete the self-evaluation. **Cycle IV required districts to evaluate the same three elements** as in Cycle III, create an evaluation report, and assure the department of their work.

Cycle V: In 2017-18, districts were again required to complete the self-evaluation. **Cycle V required districts to evaluate the same three elements** as in Cycle III and Cycle IV, create an evaluation report, and assure the department of its work.

<u>Cycle VI:</u> In 2023-24, districts were again required to complete the self-evaluation. **Cycle VI requires districts to evaluate the following elements**:

- School board policies and administrative procedures.
- Enrollment trends in classes and programs.
- Methods, practices, curriculum, and materials used in instruction, counseling, and pupil assessment and testing.
- Trends and patterns of disciplinary actions, including suspensions, expulsions, and handling of pupil harassment.
- Participation trends and patterns and school district support of athletic, extracurricular, and recreational activities.
- Trends and patterns in awarding scholarships and other forms of recognition and achievement provided or administered by the district.
- School district efforts to achieve equality of educational opportunity and nondiscrimination.
- School district technology, including electronic communications by school district staff.

Wisconsin State Statute 118.13 and Administrative Rule PI 9.06

Wisconsin State Statute 118.13	Administrative Rule PI 9.06
118.13 Pupil discrimination prohibited. (1) No person may be denied admission to any public school or be denied participation in, be denied the benefits of or be discriminated against in any curricular, extracurricular, pupil services, recreational or other program or activity because of the person's: -Sex -Ancestry -Sexual orientation -Race -Religion -National Origin -Creed -Pregnancy, marital or parental status -Physical, mental, emotional or learning disability	**PI 9.06 Evaluation.** (1) In order to provide the information necessary for the state superintendent to report on the compliance with s. 118.13, Stats., as required under s. 118.13 (3) (a)3., Stats., each board shall evaluate the status of nondiscrimination and equality of educational opportunity in the school district at least once every 5 years on a schedule established by the state superintendent. The evaluation shall include the following: a) School board policies and administrative procedures. b) Enrollment trends in classes and programs. c) Methods, practices, curriculum, and materials used in instruction, counseling, and pupil assessment and testing. d) Trends and patterns of disciplinary actions, including suspensions, expulsions, and handling of pupil harassment. e) Participation trends and patterns and school district support of athletic, extracurricular and recreational activities. f) Trends and patterns in awarding scholarships and other forms of recognition and achievement provided or administered by the school district. g) School district efforts to achieve quality of education opportunity and nondiscrimination. (2) The board shall provide an opportunity for participation in the evaluation by pupils, teachers, administrators, parents, and residents of the school district. (3) The board shall prepare a written report of the evaluation, which shall be available for examination by residents of the school district.

Section II - Contributors to the Pupil Nondiscrimination Self-Evaluation Cycle Report

The following individuals were responsible for the development, writing, and/or review of the Pupil Nondiscrimination Self Evaluation Cycle IV Report:

- Meghan Leaf, HS Counselor
- Kim Cummings, HS Counselor
- Cory Alfaro
- Teah Jernander, Elementary Counselor
- Brandon Anderson, Elementary Counselor
- Trina Slack, Athletic Director
- Julie Ennis, SHE Principal
- Alison Hoch, HS Principal

Opportunities to Participate in the Writing, Development, and Final Review/Evaluation of the Pupil Nondiscrimination Self-Evaluation Cycle IV Report 9.06(2)

Opportunity to participate in the final review of this report was offered to pupils, teachers, administrators, parents, and residents of the school district in the following manner:

☒ Open meeting portion of a scheduled school board meeting

☒ Individual meetings

☒ Department meetings

☒ Discussion item at an administrative meeting

Section III District Overview - School District of Wisconsin Dells

The School District of Wisconsin Dells serves approximately 1850 students between the ages of 3-21, across four school locations.

SDWD Mission Statment and Strategic Plan

The data below represents the demographic breakdown of our student population. It was derived and disaggregated from the Wisconsin Department of Public Instruction WISE Dash Public Database and utilized during the analysis within each of the required areas of the study. The school district submits data annually to this state-wide system. The district recommends caution in the review of data, especially from the 2019-20 and the 2020-21 school years. This data has been included but will limit some of the ability to examine multi-year trends or patterns. This was primarily due to the significant impact of the pandemic on the school's data during those years. Some of the data from the 2021-22 school year may also be impacted due to the district offering virtual learning options. During those times, co-curricular activities, clubs, class enrollments, programming, curriculum materials, discipline, and instruction were greatly impacted. For this reason, the 2022-23 data will be the primary focus and will be given greater emphasis in determining recommendations or considerations for improvement.

SDWD Enrollment Data

Section IV - School Board Policies and Administrative Procedures

The purpose of this section is to ask the district to examine the board policies and procedures adopted by the board.

By evaluating this area, school districts will have an opportunity to:

- Ensure that policies include all protected categories listed under Wis. Stat. 118.13.
- Ensure that policies address harassment or that there is a separate ani-harassment policy
- The policies are published annually, are easily accessible, and clearly articulate the compliance officers, the complaint timeline, and procedures for the complaint process.

Summary Report Data

Method of Analysis:

- Review and Examination of policies related to Pupil Nondiscrimination and Equal Education Opportunity
- Review and Examination of administrative guidelines related to Pupil Nondiscrimination and Equal Education Opportunity
- Review of Student Handbooks

Supporting Information:

The following information was reviewed:
SDWD Policies and Administrative Guidelines

- PO 3122 Nondiscrimination and Equal Employment Opportunity Professional Staff
- AG 1422 Nondiscrimination and Equal Employment OpportunityProfessional Staff
- PO4122 Nondiscrimination and Equal Employment Opportunity Support Staff
- AG 1422 Nondiscrimination and Equal Employment Opportunity Support Staff
- PO 2260.01Section 504/ADA Prohibition Against Discrimination Based on Disability
- PO 2266 Nondiscrimination On The Basis of Sex in Education Programs or Activities
- PO 5517 Student Anti Harassment

- PO 5730 Equal Access for Non-District Sponsored Clubs/Activities
- AG 2260 Nondiscrimination and Access to Equal Educational Opportunity
- AG 2266 Nondiscrimination on the Basis of Sex
- PO 4362 Employee Anti-Harassment Support Staff
- PO 1662 Employee Anti-Harassment Administration
- PO 3362 Employee Anti-Harassment Professional Staff
- School Student Handbooks
- Title IX procedures and investigative process materials

Findings:

The District has board-approved policies prohibiting discrimination against pupils based on each of the protected classes set forth in Wis. S. 118.13 and as identified in PI 9.03. The district's nondiscrimination policies generally apply to all areas of school operations, including school-sponsored programs and activities. These policies provide written procedures for filing, investigating, and resolving complaints of pupil discrimination, which set forth a written timeline for investigating complaints, providing a written response, and providing information regarding appeal procedures. The district has trained two compliance officers for gender diversity and flexibility in situations where a conflict of interest may exist. Information is shared on the school district website and in student handbooks.

Recommendations for Improvement and Implementation Strategies:

- The District's designated compliance officers (CO) are Dawn Sine, Director of Pupil Services, and Hugh Gaston, Director of Technology; ensure both COs continue to receive year Title IX training.
- The District shall continue to publish an annual class 1 legal notice and include the nondiscrimination statement in all student handbooks.
- The SDWD administration has worked with the district cultural liaison and school counselors to include wording in the 2024-25 School Handbooks addressing how acts of racism will be addressed.

Section V – Enrollment trends in classes and programs

This section asks the district to examine enrollment trends and patterns within classes and programs provided by the district.

By evaluating this area, school districts will have an opportunity to:

- Ensure progress is made each year towards increased enrollment in courses and programs by underrepresented groups based on race, gender, disability, and national origin.
- Particular programs and courses that merit attention include advanced placement and/or Dual Credit courses, talented and gifted programming, and vocational education classes or programs.

Summary Report Data

Method of Analysis:

- Review enrollment trends in Advanced Placement, Dual Credit, and Appreciation programs within the SDWD.
- The SDWD does not have a formal Gifted and Talented Program to review.
- Review of School Board Policies related to Gifted and Talented Programming.

Supporting Information:

The following information was reviewed:

- AP/DC/Apprenticeship
- SDWD Policies and Administrative Guideline

Findings:

The SDWD has a robust AP/Dual Credit program and has engaged in continual growth in its vocational education and apprenticeship programs. The SDWD does not have a designated Gifted and Talented program; however, it does offer several enrichment opportunities for students before HS. These include Math 24, Math Matters, HS Math Team, and Young Authors, taking advanced math in MS and writing contests. Decisions on which students will take advanced courses not in sync with their current grade placement are made individually at each building level, with no predetermined criteria for such placement.

Recommendations for Improvement and Implementation Strategies:

The SDWD has a robust AP/Dual Credit program and has engaged in continual growth in its vocational education and apprenticeship programs. The SDWD does not have a designated Gifted and Talented program; however, it does offer several enrichment opportunities for students before HS. These include Math 24, taking advanced math in MS, and writing contests. Decisions on which students will take advanced courses not in sync with their current grade placement are made individually at each building level, with no predetermined criteria for such placement. The SDWD is looking into ways to better track students who participate in any type of GT programming.

Section VI - Methods, Practices, Curriculum, and Materials used in instruction, counseling, and assessment

This section asks the district to examine the methods, practices, curriculum, and materials used in PK-12 school counseling to determine whether all students are included in the learning process.

By evaluating this area, school districts will have an opportunity to:

- Ensure that the goals of equity and excellence for all students are demonstrated through the school counseling practices in the district.
- Ensure counselors emphasize that courses, programs, roles, and careers are open to all students regardless of gender, race, national origin, or disability.

Summary Report Data

Method of Analysis:

- Participation and discussion with school counselors
- Review of K-12 Counseling Program Scope and Sequence completed during PACT time over the past two years.
- Review of K-12 Counseling Program Themes and Benchmarks completed during PACT time over the past two school years.
- Participation and discussion with building-level principals, elementary and middle school ELA and Math coaches, and district-level administration. These discussions occurred during the monthly Administrative and SDWD elementary and secondary management team meetings.
- Review of curriculum decisions and changes related to the counseling program

Supporting Information:

The following information was reviewed:

- SDWD K-12 School Counseling Curriculum Scope and Sequence
- Review of counseling practices and procedures (small group offerings, risk assessment procedures, and student support plans)
- Review of counseling program procedures/processes

Findings:

- In 2018, Wisconsin adopted the American School Counselor Association (ASCA) model. The ASCA National Model guides school counselors in the development of school counseling programs that:
    - are based on data-informed decision-making
    - are delivered to all students systematically, including a developmentally appropriate curriculum focused on the mindsets and behaviors all students need for postsecondary readiness and success
    - close achievement and opportunity gaps (see how equity is woven into the ASCA National Model)
    - result in improved student achievement, attendance, and discipline.
- During PACT time, the SDWD K-12 School counseling team reviewed the SDWD K-12 School Counseling State Standards and the SDWD current curriculum. The team has been concerned with the current curriculum and is reviewing the new School Counseling

Curriculum.

- The Team has also implemented Mental Health Screening practices and is continuing to work on ways to support students who are struggling with Mental Health issues.
- The MS and HS Counselors have discussed how they support students with career and college readiness.

Recommendations for Improvement and Implementation Strategies:

It is recommended that the SDWD School Counseling team finalize and implement a new School Counseling curriculum, continue to use the mental health screening tools, and expand their use and monitoring of students after completion. It is also recommended that the MS and HS counselors continue to map out how they support students with College and Career readiness. How frequently do they meet with students regarding these topics? Is there a plan for each student, where are those plans stored, etc?

Section VII – Trends and Patterns of Disciplinary Actions, including suspensions, expulsions, and handling of pupil harassment

This section aims to evaluate trends and patterns in disciplinary actions, policies, and procedures.

By evaluating this area, school districts will have an opportunity to:

- Ensure disciplinary actions and procedures are applied consistently to all students.
- Harassment policies define harassment, provide examples, explain the consequences, prohibit retaliation, and provide for as much confidentiality as reasonably possible.
- Staff, students, and parents/guardians know how to file a harassment complaint and how to do so.
- Responses to harassment are prompt, firm, and effective.

Summary Report Data

Method of Analysis:

Review of suspension rates over multiple years
Review of policies:

- PO 5605 Suspension/Expulsion of Students with Disabilities
- PO 5610 Suspension and Expulsion
- PO 5611 Due Process Rights
- Review of Student Handbooks
- Analysis of WISE Dash Discipline Data
- Review of Annual State Pupil Nondiscrimination Reports

Supporting Information:

The following information was reviewed:

- Wise Dash public data
- Expulsion records

Findings:

The SDWD number of expulsions has ranged from 1 to 2 for the past three school years. Out-of-school suspension data from Wise Dash Public indicates that Native American, Black, Hispanic, and students of two or more races have a significantly higher rate of out-of-school suspensions than do white students.

Recommendations for Improvement and Implementation Strategies:

The SDWD Administrative team and staff continue to work on connecting with all students, encouraging engagement, and examining why students may struggle behaviorally in any of the SDWD buildings. It is recommended that Administrators review the discipline data for their students much like they do the academic data for their students.

Section VIII - Trends and Patterns of School District Support of Athletic, Extracurricular, and Recreational Activities

The purpose of this section is to review participation in PK-12 athletic, extracurricular, and recreational activities to determine trends and patterns in disciplinary actions, policies, and procedures.

By evaluating this area, school districts will have an opportunity to:

- Foster and promote the goals of equity and inclusiveness in athletic, extracurricular, and recreational programs and any school-sponsored or approved activity.
- Ensure that interscholastic athletic programs for boys and girls are comparable.
- Ensure the school provides athletic, extracurricular, and recreational activities to meet the interests and abilities of diverse students, as evidenced by participation rates.

The regulation implementing Title IX requires institutions to provide equal athletic opportunities for members of both sexes and to effectively accommodate students' athletic interests and abilities. The Department's 1979 "Intercollegiate Athletics Policy Interpretation" (1979 Policy Interpretation), published on December 11, 1979, sets out a three-part test that OCR uses to determine whether an institution meets its Title IX obligations. An institution is in compliance with the three-part test if it meets any one of the following parts of the test:

1. The number of male and female athletes is substantially proportionate to their respective enrollments or
2. The institution has a history and continuing practice of expanding participation opportunities responsive to the developing interests and abilities of the underrepresented sex or
3. The institution fully and effectively accommodates the interests and abilities of the underrepresented sex.

Summary Report Data

Methods of Analysis

- Discussion with the Activities Director
- Review of SDWD student athletic participation data disaggregated by gender, ethnicity, and race.

Supporting Information

The following information was reviewed:

- WDHS athletic offerings
- Participation rates/data from the Activities Department
-

Findings:

The SDWD has more female-only athletics than male-only athletics. The budgets for both Women's and men's Athletics are very similar; they are within $800 dollars of each other for the 2023-24 school year. Football and wrestling were once considered male-only sports; however, females now participate in both sports and wrestling.

Recommendations for Improvement and Implementation Strategies

During discussions on this section, the SDWD Athletic Director reported that she is looking to enhance data collection regarding student involvement in not just sports but also clubs. Beginning for the 2024-25 school

year, students' activities will be flagged in our student management system to have more streamlined access to student participation and thus be able to more effectively desegregate the data as well. Doing this will ensure we can readily review participation levels, etc.

Section IX - Trends and Patterns in Awarding Scholarships and Other Forms of Recognition Provided or Administered by the District

This section aims to evaluate the patterns in awarding scholarships and other forms of recognition and achievement and determine whether some groups of students are significantly underrepresented as recipients of awards or other forms of recognition.

By evaluating this area, school districts will have an opportunity to:

- Ensure that all scholarships and other forms of recognition are awarded in a way that does not discriminate
- Identify and develop ways to effectively publicize scholarship and award opportunities so that all students and parents/guardians are informed.
- Develop recommendations to ensure that the amount and number of scholarships and other awards are equally distributed.

Special Note - The following legal requirements for scholarships, awards, gifts, and grants should be followed: (Please consult the DPI website for details and statute citations.). School districts may administer sex-restrictive scholarships or financial aid established through wills, trusts, bequests, and other legal instruments if the overall effect is not discriminatory, but to determine if the overall effect is nondiscretionary, a school district must first select students on the basis of nondiscriminatory criteria. The school district may then award all scholarships and aid, including sex-restricted scholarships. However, in doing so, none of the selected students can be denied aid or scholarships because some of the awards were originally designated for persons of the other sex. A district may also choose not to administer or assist in administering sex-restricted scholarships. Athletic scholarships must be available for males and females in proportion to the number of males and females participating in the interscholastic athletic programs.

Methods of Analysis

- Discussions with school counselors
- Review of policies, award recipients, and all scholarship-related materials
- Review of Scholarship winners

Supporting Information

The following information was reviewed:

- Policy 460, Student Scholarships and Policy 461, Academic Excellence Higher Education Scholarship Program
- Local Scholarship Application Form and Letter
- Information put out by the WDHS regarding scholarships and scholarship applications.
- lists of scholarship award recipients

Recommendations for Improvement and Implementation Strategies

The scholarship data (applicants and recipients) will be desegregated and shared annually with the scholarship committee and high school administration. The data will include scholarship recipient and applicant rates by gender, race, ELL, and disability status. The WDHS School Counselors and Principal will brainstorm and implement outreach strategies to increase the number of African American, Native-American, and Hispanic applicants. The scholarship committee will review the data annually and recommend changes to the process and procedures to improve student participation rates and scholarship recipients across gender, race, ethnicity, disability status, and English Language Learner Status.

Section X – School District Efforts to Achieve Equality of Education Opportunity and Nondiscrimination

This section aims to evaluate the district's efforts to achieve equality of education opportunity and nondiscrimination. It focuses on the district's efforts and progress in closing academic achievement gaps and creating a school environment that does not discriminate based on the protected categories listed in Wis. Stat. 118.13.

By evaluating this area, school districts will have an opportunity to:

- Ensure that staff have high expectations for all students
- An ongoing effort is in place to ensure equality of educational opportunity and nondiscrimination
- The school environment is welcoming to all students and parents/guardians who visit the building.
- Equality of educational opportunity and nondiscrimination are considered in the planning and implementation staff development.

Summary Report Data

In the Spring of 2024, the SDWD leadership team, administrator, and board members participated in a multi-day review and revision of the SDWD mission, vision, and belief statements. The SDWD strategic plan directly results from the work done on the mission, vision, and belief statements. This was the third review since 2014. The results of that process are linked in previous sections. All SDWD goals and drive all that the SDWD does. The SDWD plan outlines that we will continue to focus on equity within our district wall.

Method of Analysis:

- School Board Agendas
- District Strategic Plan
- Mission, Vision, and Beliefs
- Review/Discussion of Strategic Plan and process

Supporting Information:

The following information was reviewed:

- SDWD Mission Statment

Recommendations for Improvement and Implementation Strategies:

The district has a Strategic Plan that measures and reports progress to the community and school board in several areas. This plan encompasses the focus and expectations for providing an equitable educational opportunity. Continued updates of this strategic plan and the results should be shared with all shareholders within the school and community.

Section XI – School District Technology, including Electronic Communications by School District Staff

This section aims to evaluate the availability of Pupil Nondiscrimination policies and materials for students, parents, and staff.

By evaluating this area, school districts will have an opportunity to:

- Ensure that all students and parents have access to the relevant information relating to Pupil Nondiscrimination policies and procedures.
- Students, teachers, parents, and community members can participate in the self-evaluation process/review.
- The Pupil Nondiscrimination Self-Evaluation Report is available to all residents, and the PI-1198 Assurance has been provided to the Department of Public Instruction.

Summary Report Data

Method of Analysis:

- Discussion with SDWD Technology Director

Supporting Information:

The following information was reviewed:

- Review of the SDWD board policies.

Recommendations for Improvement and Implementation Strategies:

The 2023-24 Pupil Non-Discrimination report was approved by the school board on 6/24/2024; the report is linked to the SDWD website under the Pupil Services page.