



STATE OF WASHINGTON  
Methods of Administration  
Biennial Reports  
December 31, 2022

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**

CAREER AND TECHNICAL EDUCATION  
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## **Methods of Administration Overview Report**

**This report reflects the administration of Methods of Administration beginning January 1, 2020, through December 31, 2022.**

The Methods of Administration (MOA) process, as written in the Washington State New MOA State Plan in June 2022, has been combined into the Consolidated Program Review (CPR) monitoring process conducted by the Office of Superintendent of Public Instruction's (OSPI) Methods of Administration Coordinator and other program reviewers.

In 2020–21, the CPR monitoring processes conducted by the OSPI federal and state program staff focused on monitoring activities that protected civil rights and supported the provision of education focused on student learning and improved outcomes, leading to improved post-secondary outcomes, careers, and civic engagement. OSPI monitored those Local Education Agencies (LEAs) that did not complete reviews originally scheduled for 2019–20 and completed open reviews from prior years.

In 2021–22, OSPI worked with LEAs with reviews still open from the 2019–20 and 2018–19 monitoring cycles. LEAs identified for CPRs in 2021–22 were notified in August 2021.

All LEAs continued to be monitored annually through the submission and review of federal and state grant applications, ongoing technical assistance, and guidance, end-of-year reports, and other reporting requirements.

This approach to monitoring for 2021–22 ensured LEAs were able to focus on pandemic recovery efforts while still fulfilling OSPI's obligation to monitor for compliance with federal and state requirements, in alignment with our approved state plan. Emerging necessity during the ongoing crisis and further federal or state guidance leave this and other monitoring plans subject to change. All reviews, unless specific risks were identified, were and will be conducted as desk reviews. Should high-risk be evident, OSPI reserves the ability to monitor onsite and provide technical assistance and corrective action guidance as needed.

Currently, OSPI's monitoring process is using a more risk-based approach, emphasizing a continuum of monitoring activities, and focusing on continuous improvement.

**Part A: Staff Resources:**

Identification of resources allocated to the MOA compliance program during each year of the reporting period.

**2020–2021 School Year**

<b>Staff Name</b>	<b>Staff Role</b>	<b>Outcome</b>
Deifi Stolz	Methods of Administration (MOA) Program Supervisor	Reviewed data and risk ranking factors for the selection of LEAs. Conducted desk reviews, prepared Preliminary Reports and Exit Reports, approved Action Plans in collaboration with LEAs. Monitored LEAs and helped them to come into compliance. Served as agency and department contact for questions related to equity and access for CTE programs for schools and skill centers across the state. MOA NW Consortia monthly conference calls, technical assistance support, and annual training conference. Participated in the national training at the MOA Coordinators' Conference.
Rebecca Wallace	Career and Technical Education Executive Director	Oversaw the work of the MOA Program Supervisor. Primary contact in working with OSPI's oversight agency, the Workforce Training Board. Primary contact in working with the State Board for Community and Technical Colleges with the Perkins team.
Clarisse Leong	Career and Technical Education Operations Manager	Supervised the work of the MOA Program Supervisor.
Sarah Albertson	Managing Attorney, Equity and Civil Rights	Consultant on Civil Rights technical assistance findings.
Timothy McNeely	Director, Consolidated Program Review (CPR) & Rural Education	Oversaw the CPR process and interacted with the MOA Coordinator on her various desk reviews as she assisted them through the CPR process and helped close the districts reviews within the EDS Program Monitor Tool. Co-presented with the MOA Coordinator at the WA-ACTE Summer Conference on August 9, 2021.

General Resource Description: The resources used for the Methods of Administration are used for, but not limited to: data analysis, risk ranking factors for the selection of LEAs for desk reviews, technical assistance to LEAs and coworkers, policy reviews, professional development trainings, Preliminary Reports, Action Plans, monitoring of LEAs, closing out the monitoring of LEAs, Exit Reports, participation and in MOA NW Consortia trainings, and the participation in the national training at the MOA Coordinators' Conferences.

<b>2021–2022 School Year</b>		
<b>Staff Name</b>	<b>Staff Role</b>	<b>Outcome</b>
Deifi Stolz	Methods of Administration Program Supervisor	Reviewed data and risk ranking factors for the selection of LEAs. Conducted desk reviews, prepared Preliminary Reports and Exit Reports, approved Action Plans in collaboration with LEAs. Monitored LEAs and helped them to come into compliance. Served as agency and department contact for questions related to equity and access for CTE programs for schools and skill centers across the state. MOA NW Consortia monthly conference calls, technical assistance support, and annual training conference. Participated in the national training at the MOA Coordinators' Conference.
Rebecca Wallace	Assistant Superintendent, Secondary Education and Pathway Preparation	Oversees the work of the Operations Director. Primary contact in working with OSPI's oversight agency, the Workforce Training Board.
Clarisse Leong	Operations Director, Secondary Education and Pathways	Supervises the work of the MOA Program Supervisor. Primary contact in working with the State Board for Community and Technical Colleges with the Perkins team.
Sarah Albertson	Managing Attorney, Equity and Civil Rights	Consultant on Civil Rights technical assistance findings.
Timothy McNeely (Until 2/4/2022)	Director, Consolidated Program Review (CPR) & Rural Education & 21 <sup>st</sup> Century Community Learning Center Program	Managed the CPR process and interacted with the MOA Coordinator on her various desk reviews as she assisted them through the CPR process and

		helped close the districts reviews within the EDS Program Monitor Tool.
Dr. Jon Ram Mishra (Email sent 2/10/2022)	Assistant Superintendent Elementary Education, Early Learning, Special Programs and Federal Accountability	Oversees the CPR process and the work being done by Jason Miller along with the CPR Team Leads.
Jason Miller	Executive Director Elementary Education, Early Learning, Special Programs & Federal Accountability	Manages the CPR process and interacted with the MOA Coordinator on her various desk reviews as she assisted them through the CPR process and helped close the districts reviews within the EDS Program Monitor Tool. Co-presented with the MOA Coordinator at the WA-ACTE Summer Conference on August 8, 2022.  Currently is working with the MOA Coordinator as a CPR Team Lead.

General Resource Description: The resources used for the Methods of Administration are used for, but not limited to: data analysis, risk ranking factors for the selection of LEAs for desk reviews, technical assistance to LEAs and coworkers, policy reviews, professional development trainings, Preliminary Reports, Action Plans, monitoring of LEAs, closing out the monitoring of LEAs, Exit Reports, participation in MOA NW Consortia trainings, and the participation in and presenting at the national training at the MOA Coordinators' Conferences.

**Part B: State Agency's Compliance:**

**Description of OSPI's compliance with Section II(A) of the *Guidelines* (relating to distribution of funds, admissions and administration, approval of local entity action, and conducting state-run programs.)**

On September 18, 2020, the U.S. Department of Education approved OSPI's [Methods of Administration State Plan](#) to protect the civil rights of all CTE students consistent with the requirements of MOA to prevent, identify, and remedy discrimination in CTE programs.

On August 24, 2021, the U.S. Department of Education, Office for Civil Rights Office approved the Biennial Report (2020 MOA Report).

OSPI administers all federal funds in alignment with the state plan, and all state and federal requirements including, but not limited to:

- Title VI of the Civil Rights Act of 1964 and implementing regulations (34 CFR Part 100, Appendix B), *prohibits discrimination on the basis of race, color, and national origin;*
- Title IX of the Education Amendments of 1972 (34 CFR Part 106), *prohibits discrimination on the basis of sex;*
- Section 504 of the Rehabilitation Act of 1973 (34 CFR Part 104), *prohibits discrimination on the basis of disability;*

- Title II of the Americans with Disabilities Act of 1990 (28 CFR Part 35), *prohibits discrimination on the basis of disability*;
- *Vocational Education Program Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, published in the Federal Register March 21, 1979 (Guidelines).

All recipients of federal funds attest to and assures compliance with the above federal Civil Rights statutes and regulations.

As part of the process monitoring subrecipients through the formal processes of the Perkins application process, the Consolidated Program Review, and program evaluations, as well as the informal processes of providing technical assistance, OSPI ensures that CTE programs are accessible, and unlawful discrimination does not take place. OSPI ensures all state agency compliance requirements are met to maintain the authority to conduct state-run programs.

### **Impacts to Monitoring (March 13, 2020, to October 6, 2020)**

The Biennial Report reflects the LEAs selected for review from OSPI’s developed federal program monitoring cycle that is aligned with the Department of Education’s direction for risk-based monitoring.

#### **Notable Impacts**

March 13, 2020 – Due to COVID–19 Pandemic, Governor Inslee issued an executive order to close all 295 school districts for six weeks, this closure was later extended through the end of the 2019-2020 school year.

In the spring of 2020, OSPI temporarily suspended all state and federal monitoring activities through the end of the school year, due to COVID-19 school facility closures.

October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: [B083–20 Executive Services](#)

March 15, 2021 – Governor Inslee signed an emergency proclamation requiring in-person education opportunities for public K-12 schools; this order allowed for schools to stagger reintroduction of students to campus and required that a hybrid option must be made available to all students by April 19, 2021.

September 8, 2022 – Governor Inslee announced the end to remaining COVID-19 emergency orders and the state of emergency by October 31.

### **Components of Monitoring for 2020–21 and 2021–22**

OSPI developed a federal program monitoring cycle that is aligned with the Department of Education’s direction for risk-based monitoring. The CPR process consists of a tiered monitoring system that includes the following types of reviews:

- Selected LEAs based on risk analysis (up to ten LEAs).

- Four largest LEAs (by federal fund allocations in programs reviewed).
- Newly established LEAs such as charter schools and State-Tribal Compact schools.
- ESDs acting as LEAs for Title IV, Part A.

A risk assessment is used to identify the districts where additional attention is needed. Listed below are the risk assessments used for the 2020–21 School Year and the 2021–2022 School Year.

**CPR Risk Assessment Used for 2019–20 School Year**

*(This was the same one used for 2020–21 School Year since the CPR process in the 2019–20 School Year was suspended due to COVID pandemic.)*

**CONSOLIDATED PROGRAM REVIEW (CPR)  
LEA PERFORMANCE DATA COLUMN DESCRIPTIONS**

**2019–20 SCHOOL YEAR**

The Office of Superintendent of Public Instruction (OSPI) developed a federal program monitoring cycle that is aligned with the Department of Education’s direction for risk-based monitoring. The Consolidated Program Review (CPR) process consists of a tiered monitoring system that includes the following types of reviews:

- Selected LEAs based on risk analysis (up to ten LEAs).
- Four largest LEAs (by federal fund allocations in programs reviewed).
- Educational Service District regional on-site or desk review cycle (ESDs 114 and 101 in 2019–20).
- Newly established LEAs such as charter schools and State-Tribal Compact schools.
- ESDs acting as LEAs for Title IV, Part A.

A risk assessment is used to identify the districts where additional attention is needed. The selected portion of the monitoring process concentrates on assessing student performance and program effectiveness data, and the level of internal management and controls at Washington LEAs. The review uses twelve performance data elements (consisting of 29 possible points total) that may have a significant impact on a LEA’s compliance with federal programs and receipt of federal funding.

The risk assessment included the following factors:

- LEA Size
- OSSI - Comprehensive or Targeted Support Identification
- Bilingual - EL Proficiency Rates, 5-year EL Transition Rate, and Dually Identified EL/SPED Rate (2017–18)
- Special Education - IDEA Determinations (2017–18)
- Career and Technical Education (CTE) - State Allocated Funds and Perkins Performance Improvement Plan (PIIP) Indicators
- Graduation Rate (2016–17 and 2017–18)
- Fiscal - Federal Funds Allocated by Programs under CPR per FTE (2018–20 funds and 2018–19 FTE)
- Audit Finance and Grant Administration - Risk Audit Ranking (2018–19)
- Title I, Part A - Math and ELA Low Income 4th Grade SBAC Score (2017–18)



The information is computed, each district is grouped by enrollment, and then ranked by risk. A team meets to review the LEAs risk score ranking.

The attached table describes each performance data element and how a LEA’s score is calculated. The data sources used are from the most current and readily available data within the agency. LEAs with the highest percent or score will receive a selected monitoring on-site review. Determination of visits is dependent on the number of LEAs with the highest scores, reasonableness of OSPI staff’s ability to conduct effective visits, and fiduciary responsibility.

<b>Column</b>	<b>Code</b>	<b>Description of Cell</b>	<b>Raw Data / Score Calculation</b>	<b>Data Year</b>	<b>Data Source</b>	<b>Available</b>
D	LEA Size	<b>LEA Size</b> <i>LEAs are grouped/scored as large (3), medium (2), and small (1) based on student count.</i>	<i>Raw Data:</i> In the form of student count by LEA.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>• LEAs with a pop. above 5000 received a score of 3.</li> <li>• LEAs with a pop. Between 1500 and 5000 received a score of 2.</li> <li>• LEAs with a pop. below 1500 received a score of 1.</li> </ul>	2017-18	OSPI Report Card or Data Portal	June
H	Comprehensive / Targeted	<b>Comprehensive Schools</b> <i>Schools identified for support as the lowest-performing five percent of Title I schools, based on achievement on the statewide assessments. Comprehensive</i>	<i>Raw data:</i> List of Comprehensive and Targeted Schools provided by the Office of System and School Improvement.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>• LEAs with more than 75% of their</li> </ul>	2018-19	OSSI – Tisha Kuhn	June

		<p><i>schools include high schools that have a consistent graduation rate of less than two-thirds of their students.</i></p> <p><b>Targeted Schools</b></p> <p><i>Schools identified for support as the lowest-performing ten percent of Title I schools, based on achievement on the statewide assessments. Targeted schools include schools identified due to performance of three or more student groups and those identified for English Learner progress.</i></p>	<p>schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 4.</p> <ul style="list-style-type: none"> <li>• LEAs with more than 50% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 3.</li> <li>• LEAs with more than 25% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 2.</li> <li>• LEAs with more than 0% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 1.</li> <li>• LEAs with NO schools in</li> </ul>			
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			Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 0.			
I	EL Proficiency	<p><b>English Language Proficiency Assessment (ELPA) 21</b></p> <p><i>The ELPA21 summative assessment measures students' English language proficiency, both knowledge and skills, in reading, listening, writing, and speaking. This is an assessment given to all students who qualify for English language development (ELD) services with a placement test. Results from this test determine which students are eligible to continue receiving ELD services.</i></p>	<p><i>Raw data:</i> In the form of percentage students who have tested English proficient on the ELPA21, excluding LEAs with EL populations n&lt;20.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average greater than 1 percentage point below the rounded down state average receive a score of 2.</li> <li>• LEAs with an average within 1 percentage point below the rounded down state average receive a score of 1.</li> <li>• LEAs with an average above the rounded</li> </ul>	2017-18	Peggy Carlson or the Federal Programs, Title III Tableau Dashboard	January

			<p>down state average receive a score of 0.</p> <p><i>Example: If the state average proficiency is 13.6 and an LEA has an average proficiency of 11.9, the state average is rounded down to 13 and the LEA receives a score of 2.</i></p>			
J	EL Transition Rates	<p><b><i>EL Students Not Yet Transitioned out of EL Services after 5 years</i></b></p> <p><i>Measure includes students who do not score proficient on the ELPA21 after 5 years or more of ELD services.</i></p>	<p><i>Raw data:</i> In the form of percentage students who have not tested out of ELD services after 5 years by scoring proficient on the ELPA21, excluding LEAs with EL populations n&lt;20.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average greater than 5 percentage points above the rounded up state average</li> </ul>	2017-18	Peggy Carlson or the Federal Programs, Title III Tableau Dashboard	March

			<p>receive a score of 2.</p> <ul style="list-style-type: none"> <li>• LEAs with an average within 5 percentage points above the rounded up state average receive a score of 1.</li> <li>• LEAs with an average below the rounded up state average receive a score of 0.</li> </ul> <p><i>Example: If the state average is 24.6 and an LEA has an average of 30.5, the state average is rounded up to 25 and the LEA receives a score of 2.</i></p>			
K	EL/SpEd	<b><i>ELs who Qualify for Special Education LEAs that identify their EL students for special education at significantly higher rates than the state for all identified students have a likely potential</i></b>	<i>Raw Data:</i> In the form of percentages of ELs who qualify for Special Education by LEA. Excluding data for LEAs with EL populations n<50 AND n<20%.	2017-18	Peggy Carlson or the Federal Programs, Title III Tableau Dashboard	March

		for misidentifying their EL students.	<p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with an average of 25% or higher receive a score of 2.</li> <li>• LEAs with an average of 20-24.9% receive a score of 1.</li> <li>• LEAs with an average below 20% receive a score of 0.</li> </ul>			
L	SpEd IDEA	<p><b>Special Ed</b></p> <p><i>The Individuals with Disabilities Education Act (IDEA) requires the U.S. Department of Education to make annual "determinations" regarding the overall compliance of each State with the requirements of Part B of the IDEA. States are likewise required to make "determinations" regarding the level of overall compliance each year for each district within the State.</i></p>	<p><i>Raw Data:</i> A list of LEAs sorted by compliance classification as determined by the WA state.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs identified as having Met Requirements receive a score of 0.</li> <li>• LEAs identified as Needing Assistance receive a score of 1.</li> <li>• LEAs identified as Needing Intervention receive a score of 3.</li> <li>• LEAs identified as Needing Substantial Intervention receive a score of 4.</li> </ul>	2017-18	Special Ed OSPI Website	November of prior year

		<i>IDEA identifies specific technical assistance and/or enforcement actions that the State must take under specific circumstances for districts that are not determined to "meet requirements."</i>	<i>A score of 4 has been given LEAs who need Substantial Intervention, as this is a rare and noteworthy SpEd risk indicator and its score should reflect such. The jump from 1 to 3 in scoring is done because it is the opinion of the CPR department that LEAs should not be significantly scored against for needing intervention; 2 being too weighty a score.</i>			
M	CTE State Funds	<b>LEA Perkins Allocation Requirements</b> <i>LEAs who do not meet the minimum allocation requirements (less than \$15,000) may not be as familiar with permissible/non-permissible use of funds and/or the requirements for federal grant</i>	<i>Raw Data:</i> In the form of LEAs state CTE allocation amounts.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>LEAs that have received allocations as low as \$15,000 or below OR allocations above \$100,000 receive a score of 2.</li> </ul>	2018-19	Becky Wallace or Samantha Sanders	June

		<p><i>management. Generally, these LEAs have lower state allocations as well. Due to financial constraints, these LEAs may use their federal funds based on LEA need rather than what is federally mandated. In addition, a higher allocation may mean the LEA could benefit from monitoring.</i></p>	<ul style="list-style-type: none"> <li>• LEAs that have received an allocation between \$15,000 and \$100,000 receive a score of 0.</li> </ul>			
N	CTE - PPIP Indicators	<p><b>LEA Perkins Performance Indicators</b></p> <p><i>LEAs that have failed one or more Perkins Indicators for three or more consecutive years via the PPIP review. LEAs who have consecutively failed indicators may be required to use their federal funds in a manner designated by the state to improve local</i></p>	<p><i>Raw Data:</i> In the form of LEAs who have failed one or more Perkins Indicators for 3 consecutive years.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs that have failed one or more PPIP Indicators for 3 consecutive years receive a score of 2.</li> <li>• LEAs that have not failed one or more PPIP Indicators for 3</li> </ul>	2014-17	Becky Wallace or Samantha Sanders	June/July



		<i>performance scores. Failure to meet state targets set by the federal government is an existing risk factor and reported in the Consolidated Annual Report.</i>	consecutive years receive a score of 0.			
O	Low Income Grad Rate	<b>LEA performance</b> <i>Defined by the number of graduated students identified as low-income compared to their non-cohort group.</i>	<p><i>Raw Data:</i> In the form of the percentage of graduated students identified as low-income compared to the students who were identified as non-low-income.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a decrease in the low-income graduation rate and above the average low-income grad rate receive a score of 3.</li> <li>• LEAs with an increase in the low-income graduation rate and above the average low-income grad rate</li> </ul>	2017-18	Unsuppressed from Student Information	June

			<p>receive a score of 2.</p> <ul style="list-style-type: none"> <li>• LEAs with a decrease in the low-income graduation rate and below the average low-income grad rate receive a score of 1.</li> <li>• LEAs with an increase in the low-income graduation rate and below the average low-income grad rate receive a score of 0.</li> </ul>			
P	Funds/FTE	<p><b>Financial-Grant Administration</b></p> <p><i>This measure identifies the magnitude of federal funds in a LEA. Those with higher ratios of funding per full time equivalent (FTE) student are managing more federal programming than those with lower amounts. The risk assessment ranks those with higher ratios</i></p>	<p><i>Raw data:</i> In list format by LEA for all special programs including their funding.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a Funds/FTE above 1000 received a score of 4.</li> <li>• LEAs with a Funds/FTE above 600 received a score of 3.</li> <li>• LEAs with a Funds/FTE above 300 received a score of 2.</li> </ul>	2018-19, 2019-20	<p>Funds – Vicky Dyer</p> <p>FTE – Becky McLean</p> <p>Timothy McNeely – RLIS</p> <p>McKinney-Vento – Melinda Dyer</p>	June/July

		<p><i>ahead of those with lower ratios for the purpose of LEA selection for monitoring and determining an on-site or desk review. The per-FTE ratio provides a proportion LEAs can be ranked by risk by size of LEA.</i></p>	<ul style="list-style-type: none"> <li>• LEAs with a Funds/FTE above 100 received a score of 1.</li> <li>• LEAs with a Funds/FTE below 100 received a score of 0.</li> </ul>			
Q	Risk Audit	<p><b>Audit-Monitoring</b></p> <p><i>This cell raises a focus of concern if a LEA has received any federal audit findings regarding allowability, eligibility, procurement, and reimbursements. Special Education and Child Nutrition findings are excluded.</i></p>	<p><i>Raw data:</i> Raw Data not available.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEA did not require a single audit (under \$ threshold). LEA did not have any federal findings. LEA had a federal finding for a program not included in the CPR and the finding was a program-specific requirement (not cross-cutting such as time/effort). If these qualifications are met the</li> </ul>	2018-19	Debbie Crawford or Amy Harris	July

			<p>LEA will receive a score of 0.</p> <ul style="list-style-type: none"> <li>• LEA received one finding and there were no questioned costs. If it was an isolated issue resulting in questioned costs, the LEA will receive a score of 1.</li> <li>• LEA received more than one finding (or there were several issues in one finding) and/or there were questioned costs. Other factors will be considered such as the amount of questioned costs, materiality, systemic control issue, audit history, etc. These LEAs will receive a score of 2.</li> </ul>			
R-S	4th Grade Math/ELA SBAC	<b>Student Achievement</b> <i>as defined by the amount of students identified as low-income who</i>	<i>Raw Data:</i> A list by LEA for the count of low-income students who met standard on the 2016–17 SBAC	2017–18	Unsuppressed from Student Information	June

		<p><i>met standard for SBAC.</i></p>	<p>for math and ELA.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs whose percentage of low income students met standard below the state average received a score of 2.</li> <li>• LEAs whose percentage of low income students met standard above the state average (as compared to other low income LEAs), but below the state average test score for all populations received a 1.</li> <li>• LEAs whose percentage low income students met standard above the state average test score for all populations received a 0.</li> </ul>			

## CPR Risk Assessment Used for the 2021–22 School Year

### CONSOLIDATED PROGRAM REVIEW (CPR) LEA PERFORMANCE DATA COLUMN DESCRIPTIONS

#### 2021–22 SCHOOL YEAR

The Office of Superintendent of Public Instruction (OSPI) developed a federal program monitoring cycle that is aligned with the Department of Education’s direction for risk-based monitoring. The Consolidated Program Review (CPR) process consists of a tiered monitoring system that includes the following types of reviews:

- Selected LEAs based on risk analysis (up to ten LEAs).
- Four largest LEAs (by federal fund allocations in programs reviewed).
- Newly established LEAs such as charter schools and State-Tribal Compact schools.
- ESDs acting as LEAs for Title IV, Part A.

A risk assessment is used to identify the districts where additional attention is needed. The selected portion of the monitoring process concentrates on assessing student performance and program effectiveness data, and the level of internal management and controls at Washington LEAs. The review uses eight performance data elements (consisting of 19 possible points total) that may have a significant impact on a LEA’s compliance with federal programs and receipt of federal funding.

The risk assessment included the following factors:

- LEA Size
- OSSI - Comprehensive or Targeted Support Identification (Originally identified in 2018–19)
- Special Education - IDEA Determinations (2020–21)
- Career and Technical Education (CTE) – State Allocated Funds (2021–22) and Perkins Performance Improvement Plan (PPIP) Indicators (2019–21)
- Graduation Rate (2019–20 and 2020–21)
- Fiscal - Federal Funds Allocated by Programs under CPR per FTE (2021–22 Funds and 2020–21 FTE)
- Audit Finance and Grant Administration - Risk Audit Ranking (2020–21)

**Note:** To accommodate for the impact COVID-19 had on students, schools, and districts certain data points used in past risk assessments have been eliminated this year. These include our English Language Learner identifiers and our low-income standardized testing SBAC identifiers. Using these data would inaccurately portray districts and/or incorrectly presume risk.

The information is computed, each district is grouped by enrollment, and then ranked by risk. A team meets to review the LEAs risk score ranking.

The attached table describes each performance data element and how a LEA’s score is calculated. The data sources used are from the most current and readily available data within the agency. LEAs with the highest percent or score will receive a selected monitoring on-site review. Determination of visits is dependent on the number of LEAs with the highest scores, reasonableness of OSPI staff’s ability to conduct effective visits, and fiduciary responsibility.

Column	Code	Description of Cell	Raw Data / Score Calculation	Data Year	Data Source	Available
D	LEA Size	<b>LEA Size</b> <i>LEAs are grouped/scored as large (3), medium (2), and small (1) based on student count.</i>	<i>Raw Data:</i> In the form of student count by LEA.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>• LEAs with a pop. above 5000 received a score of 3.</li> <li>• LEAs with a pop. Between 1500 and 5000 received a score of 2.</li> <li>• LEAs with a pop. below 1500 received a score of 1.</li> </ul>	2020 –21	OSPI Report Card or Data Portal	June
H	Comprehensive / Targeted	<b>Comprehensive Schools</b> <i>Schools identified for support as the lowest-performing five percent of Title I schools, based on achievement on the statewide assessments. Comprehensive schools include high schools that have a consistent</i>	<i>Raw data:</i> List of Comprehensive and Targeted Schools provided by the Office of System and School Improvement.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>• LEAs with more than 75% of their schools in Targeted 3+, Targeted EL Support,</li> </ul>	2018 –19	OSSI – Tisha Kuhn	June

		<p><i>graduation rate of less than two-thirds of their students.</i></p> <p><b>Targeted Schools</b></p> <p><i>Schools identified for support as the lowest-performing ten percent of Title I schools, based on achievement on the statewide assessments. Targeted schools include schools identified due to performance of three or more student groups and those identified for English Learner progress.</i></p>	<p>and/or Comprehensive support receive a score of 4.</p> <ul style="list-style-type: none"> <li>• LEAs with more than 50% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 3.</li> <li>• LEAs with more than 25% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 2.</li> <li>• LEAs with more than 0% of their schools in Targeted 3+, Targeted EL Support, and/or Comprehensive support receive a score of 1.</li> <li>• LEAs with NO schools in Targeted 3+, Targeted EL Support, and/or</li> </ul>			
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			Comprehensive support receive a score of 0.			
I	SpEd IDEA	<p><b>Special Ed</b></p> <p><i>The Individuals with Disabilities Education Act (IDEA) requires the U.S. Department of Education to make annual "determinations" regarding the overall compliance of each State with the requirements of Part B of the IDEA. States are likewise required to make "determinations" regarding the level of overall compliance each year for each district within the State. IDEA identifies specific technical assistance and/or enforcement actions that the State must take under specific circumstances for districts that</i></p>	<p><i>Raw Data:</i> A list of LEAs sorted by compliance classification as determined by the WA state.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs identified as having Met Requirements receive a score of 0.</li> <li>• LEAs identified as Needing Assistance receive a score of 1.</li> <li>• LEAs identified as Needing Intervention receive a score of 3.</li> <li>• LEAs identified as Needing Substantial Intervention receive a score of 4.</li> </ul> <p><i>A score of 4 has been given LEAs who need Substantial Intervention, as this is a rare and noteworthy SpEd risk indicator</i></p>	2020-21	Special Education, OSPI Website	November of prior year

		are not determined to "meet requirements."	and its score should reflect such. The jump from 1 to 3 in scoring is done because it is the opinion of the CPR department that LEAs should not be significantly scored against for needing assistance; 2 being too weighty a score.			
J	CTE State Funds	<b>LEA Perkins Allocation Requirements</b> <i>LEAs who do not meet the minimum allocation requirements (less than \$15,000) may not be as familiar with permissible/non-permissible use of funds and/or the requirements for federal grant management. Generally, these LEAs have lower state allocations as well. Due to financial constraints, these LEAs may use their federal</i>	<i>Raw Data:</i> In the form of LEAs state CTE allocation amounts.  <i>Score Calculation Procedure:</i> <ul style="list-style-type: none"> <li>LEAs that have received allocations as low as \$15,000 or below OR allocations above \$100,000 receive a score of 2.</li> </ul> LEAs that have received an allocation between \$15,000 and \$100,000 receive a score of 0.	2021-22	Clarisse Leong or Vicky Dyer, CTE	June

		<i>funds based on LEA need rather than what is federally mandated. In addition, a higher allocation may mean the LEA could benefit from monitoring.</i>				
K	CTE - PPIP Indicators	<p><b>LEA Perkins Performance Indicators</b></p> <p><i>LEAs that have failed one or more Perkins Indicators for three or more consecutive years via the PPIP review. LEAs who have consecutively failed indicators may be required to use their federal funds in a manner designated by the state to improve local performance scores. Failure to meet state targets set by the federal government is an existing risk factor and reported in the</i></p>	<p><i>Raw Data:</i> In the form of LEAs who have failed one or more Perkins Indicators for 2 consecutive years.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs that have failed one or more PPIP Indicators for 2 consecutive years receive a score of 2.</li> <li>• LEAs that have not failed one or more PPIP Indicators for 2 consecutive years receive a score of 0.</li> </ul>	2019 – 2020 & 2020 – 2021	Clarisse Leong, CTE	June/July

		<i>Consolidated Annual Report.</i>				
L	Low Income Grad Rate	<p><b>LEA performance</b></p> <p><i>Defined by the number of graduated students identified as low-income compared to their non-cohort group.</i></p>	<p><i>Raw Data:</i> In the form of the percentage of graduated students identified as low-income compared to the students who were identified as non-low-income.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs whose low-income graduation rate decreased from last year and is below the state average low-income grad rate receive a score of 3.</li> <li>• LEAs with an increase in the low-income graduation rate from last year and below the state average</li> </ul>	SY 2020 & 2021	Unsuppressed from Student Information	July

			<p>low-income grad rate receive a score of 2.</p> <ul style="list-style-type: none"> <li>• LEAs with a decrease in the low-income graduation rate and above or equal to the average low-income grad rate receive a score of 1.</li> <li>• LEAs with an increase in the low-income graduation rate and above the average low-income grad rate receive a score of 0.</li> </ul>			
M	Funds/FTE	<p><b>Financial-Grant Administration</b></p> <p><i>This measure identifies the magnitude of federal funds in a LEA. Those with higher ratios of funding per full time equivalent (FTE) student are managing more federal programming than those with lower amounts.</i></p>	<p><i>Raw data:</i> In list format by LEA for all special programs including their funding.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEAs with a Funds/FTE above 1000 received a score of 4.</li> <li>• LEAs with a Funds/FTE above 600 received a score of 3.</li> </ul>	2021-22	<p>Funds – Vicky Dyer</p> <p>FTE – Becky McLean</p> <p>RLIS – Tony May</p> <p>McKinney-Vento – Melinda Dyer</p>	July/August

		<p><i>The risk assessment ranks those with higher ratios ahead of those with lower ratios for the purpose of LEA selection for monitoring and determining an on-site or desk review. The per-FTE ratio provides a proportion LEAs can be ranked by risk by size of LEA.</i></p>	<ul style="list-style-type: none"> <li>• LEAs with a Funds/FTE above 300 received a score of 2.</li> <li>• LEAs with a Funds/FTE above 100 received a score of 1.</li> <li>• LEAs with a Funds/FTE below 100 received a score of 0.</li> </ul>			
N	Risk Audit	<p><b>Audit-Monitoring</b></p> <p><i>This cell raises a focus of concern if a LEA has received any federal audit findings regarding allowability, eligibility, procurement, and reimbursements . Special Education and Child Nutrition findings are excluded.</i></p>	<p><i>Raw data:</i> Raw Data not available.</p> <p><i>Score Calculation Procedure:</i></p> <ul style="list-style-type: none"> <li>• LEA did not require a single audit (under \$ threshold). LEA did not have any federal findings. LEA had a federal finding for a program not included in the CPR and the finding was a program-specific requirement (not cross-</li> </ul>	2020 -21	Debbie Crawford or Amy Harris	July

			<p>cutting such as time/effort). If these qualifications are met the LEA will receive a score of 0.</p> <ul style="list-style-type: none"> <li>• LEA received one finding and there were no questioned costs. If it was an isolated issue resulting in questioned costs, the LEA will receive a score of 1.</li> <li>• District's single audit report has not been issued yet and is past due. The LEAs will receive a score of 1.</li> <li>• LEA received more than one finding (or there were several issues in one finding) and/or there were questioned costs. Other factors will be considered such as the amount of questioned costs, materiality, systemic control issue,</li> </ul>			
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			audit history, etc. These LEAs will receive a score of 2.			
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**CPR Checklist 2019–2020 (Used for 2020–2021 School Year as well due to the COVID pandemic)**

**CTE State and Federal Carl D. Perkins Act of 2006/Career and Technical**

<b>Item</b>	<b>Description</b>	<b>Evidence</b>	<b>Determination</b>
12.1	<p><b>Assurances</b>  <i>The LEA complies with the assurances for state and federal funds. State CTE Standards and Perkins Act of 2006 (Voc. Ed. State Enhancement Funds, Carl D. Perkins Act of 2006) Sec 134 (b)(6)</i></p>	<p><b>LEA Level</b>  <input type="checkbox"/> A. Signed and dated copy of current year Perkins Assurances.  <input type="checkbox"/> B. Copy of minutes from School Board meeting in which Perkins Local Plan was approved.</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A
12.2	<p><b>Frameworks</b>  <i>Improve academic and technical skills of students enrolled in career and technical education programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs. Sec 134(b)(3)(B)</i></p>	<p><b>LEA Level</b>  <input type="checkbox"/> A. Copy of the current year course catalog(s) identifying CTE courses.  <input type="checkbox"/> B. Locally completed and modified frameworks with appropriate signatures and all required components (including relevant GLEs, EALRs, and/or CCSSs) for ALL approved CTE courses taught in the LEA (<i>must provide one sample framework for each program area offered within the LEA</i>).</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A
12.3	<p><b>Community and Educational Partnerships</b>  <i>Community and educational partnerships. The LEA ensures that parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, representatives of business (including small business) and industry, labor organizations, representatives of special populations, and other interested individuals are involved in the development, implementation, and evaluation of career and technical education programs. Sec 134(b)(5)</i></p>	<p><b>LEA Level</b>  <input type="checkbox"/> A. Membership roster list that reflects representatives from the program specific business, industry, and community agencies. (List must include the program specific committee title, member names, specific industry/business they are representing, and/or community agency they represent).  <input type="checkbox"/> B. Advisory committee meeting minutes and copy of approved minutes from previous meetings.  <input type="checkbox"/> C. Signed attendance sheet.</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A
12.4	<p><b>Special Populations</b>  <i>The LEA reviews CTE programs, and identifies and adopts strategies to overcome barriers that result in lowering rates of access to, or lowering success in the programs, for special populations; and provides programs that are designed to enable the special</i></p>	<p><b>LEA Level</b>  <input type="checkbox"/> A. Copy of current year, class/course level CTE Enrollment Report. Report must identify gender, race, and special population.  <input type="checkbox"/> B. Examples of evidence include: tutorial</p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A

	<p>populations to meet the local adjusted levels of performance. Individuals who are members of special populations will not be discriminated against on the basis of their status as members of the special populations. Sec 134(b)(8&amp;9)(A-B)</p> <p>Special Populations as defined in Perkins Act of 2006: The Official Guide—</p> <ul style="list-style-type: none"> <li>• Individuals with disabilities</li> <li>• Individuals from economically disadvantaged families, including foster children.</li> <li>• Individuals preparing for non-traditional fields.</li> <li>• Single parents, including single pregnant women.</li> <li>• Individuals with limited English proficiency.</li> </ul>	<p>services; language assistance; 504 plans; IEPs; or achievement evaluations for special population students (LEP, foster children, individuals preparing for non-traditional fields, etc.).</p> <p><input type="checkbox"/> C. Evidence of how the LEA is addressing barriers to enrollment in CTE courses, for special populations. May include:</p> <ul style="list-style-type: none"> <li>• Photographic evidence of modifications, ensuring ADA accommodations are met, (lab stations, equipment adaptations, classroom accessibility, etc.)</li> <li>• Documentation of availability of supportive personnel</li> <li>• Instructional aids and devices</li> <li>• Samples of modified curriculum (e.g., ELLs, SPED)</li> <li>• Samples of targeted announcements to students or families</li> <li>• Copies of transition plans</li> <li>• Samples of targeted career guidance</li> <li>• Documentation of internship or work experience</li> <li>• Documentation of targeted professional development.</li> </ul>	
12.5	<p>Professional Development / CTE Personnel</p> <p>LEA provides professional development programs to teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrated CTE programs and supports education programs for teachers of CTE in public schools and other public school personnel who are involved in the direct delivery of educational services to CTE students, to ensure that such teachers and personnel stay current with all aspects of an industry. Sec 135(5)(A-B)</p>	<p>LEA Level</p> <p><input type="checkbox"/> A. List of all CTE staff (teachers, administrators and counselors) involved in professional development opportunities (list must include names of CTE teachers, teacher assignments, dates of the PD, and conference/workshop titles).</p> <p><input type="checkbox"/> B. Copies of Professional Growth Plans for all instructors on conditional or probationary teaching certificates.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p>
12.6	<p>Leadership and Employability LEA provides students with leadership skill development opportunities available at the local, state, national, and international level. Sec 124 and Sec 135(c)</p>	<p>LEA Level</p> <p><input type="checkbox"/> A. List of student leadership opportunities (CTSOs &amp; Equivalents) by program area available in building(s).</p> <p><input type="checkbox"/> B. Copy of affiliated membership rosters or a program of work for CTSO-equivalent leadership (aligned with the content standards of the courses).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p>
12.7	<p>Links to Post-Secondary Opportunities</p> <p>LEA develops and implements a Program of Study that includes academic standards and relevant CTE content in a coordinated, non-duplicated sequence of courses from secondary to postsecondary.</p> <p>Leads to an industry-recognized</p>	<p>LEA Level</p> <p><input type="checkbox"/> A. One signed Program of Study Assurance Checklist form.</p> <p><input type="checkbox"/> B. Completed Program of Study template aligned with the Perkins 5-Year Application Plan (on page 9).</p> <p><input type="checkbox"/> C. Evidence that the courses within the</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p>

	<p><i>credential or certificate, employment, or degree.</i></p> <p><i>May include opportunities to participate in dual or concurrent enrollment programs. Sec 122(c)(1)(A)(i-iv)</i></p>	<p>Identified Program of Study (career cluster and pathways) have been approved by OSPI (e.g., the identified course approvals).</p> <p><input type="checkbox"/> D. Evidence that the instructor holds a current CTE certificate to teach the identified classes as referenced on the LEA's Program of Study (e.g., teacher certification with V-Code).</p>	
12.8	<p><i>Extended Learning Opportunities LEA provides students with strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences. Sec 135(b)(3)</i></p>	<p>LEA Level</p> <p><input type="checkbox"/> A. Documentation that learning is extended into the community (e.g., Supervised Agricultural Experience (SAE) documentation, service learning activities, Work-Based learning, or cooperative worksite learning activities).</p> <p><input type="checkbox"/> B. Documentation that time is allowed for staff coordination of extended learning.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p>
12.9	<p><i>Program Evaluation LEA evaluates annually, using the LEA's local adjusted levels of performance and CTE activities in its program. Sec 123(b)(1)</i></p>	<p>LEA Level</p> <p><input type="checkbox"/> A. Program Specific evaluations are to be conducted yearly and approved by Advisory Committee Chair.</p> <p><input type="checkbox"/> B. Copy of LEA-wide Plan approved by school board.</p> <p><input type="checkbox"/> C. Evidence that the LEA has implemented the approved Perkins Performance Improvement Plan (applicable only if an LEA did not meet one or more of the performance measures).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p>

## CPR Checklist 2021–2022 School Year

### Perkins--Career and Technical

This program checklist must be completed by each LEA participating in CTE, regardless of fund source (federal Perkins or state CTE enhanced funding)

Item	Description	Evidence	Determination
12.1	<p><b>Assurances and Plan Approval</b></p> <p><i>The LEA complies with the assurances for state and federal funds, state CTE RCWs, and the Strengthening Career and Technical Education for the 21st Century Act (Perkins V).</i></p>	<p><b>LEA Level</b></p> <p><i>For 12.1 A provide evidence only if the LEA applied and received Perkins funding in the last two years. If not, please Add Comment stating "N/A – Did not receive Perkins funds." Please provide evidence for 12.1.B regardless of Perkins grant funds.</i></p> <p><input type="checkbox"/> A. Copy of physically signed and dated current-year Perkins Assurances from grant application.</p> <p><input type="checkbox"/> B. Copy of minutes from School Board meeting in which the CTE Four-Year Planning Requirement (formerly "District Wide Plan") was approved by the board.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A – Limited</p>
12.2	<p><b>State CTE Approval/Frameworks</b></p> <p><i>The LEA improves the academic and technical skills of students participating in career and technical education programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE programs to ensure a well- rounded education. (Perkins V – Sec. 133 (b)(4))</i></p> <p><i>The LEA supports integration of academic skills into CTE programs and programs of study. (Perkins V- Sec. 135 (b)(3))</i></p> <p><i>The LEA will provide access to at least one CTE equivalency course. (CTE High School Course equivalencies – RCW 28A.230.097)</i></p> <p><i>The LEA will meet state approval requirements through course and program approval. (Career and Technical Education – Plans – Standards – RCW 28A.700.010 - Career and technical education— Plans—Standards—</i></p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. List of all CTE courses offered by program area including application ID, proof of state approval and identification of any courses offered as state and/or local equivalencies identifying the type of academic credit offered. <i>Note: The course approval ID number does not show approval of the course, only that the application has been submitted. (Evidence of state approval of courses must include uploaded Program Approval signature pages with signatures for each program offered. If courses were approved outside of the program review cycle, then individual course signature pages with signatures must be uploaded. See OSPI CTE CPR 12.2 Optional Resource.)</i></p> <p><input type="checkbox"/> B. Upload one approved, locally updated framework for each program area offered within the district (Additional frameworks may be requested during onsite visits.) <i>Note: Approved, locally updated frameworks must include current Washington</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A – Limited</p>

	<i>Technical assistance—Leadership development.)</i>	<i>Academic Learning Standards, relevant industry standards, and Leadership Standards.</i>	
<b>12.3</b>	<p><b>Community and Educational Partnerships and Program Evaluation</b>  <i>The LEA ensures that parents, students, academic and CTE teachers, faculty, administrators, career guidance and academic counselors, representatives of business (including small business) and industry, labor organizations, parents and students, representatives of Indian Tribes and Tribal organizations, representatives of special populations (as defined in Perkins V), and other interested individuals are involved in the development, implementation, and evaluation of career and technical education programs. (Perkins V – Sec. 134 (d))</i></p> <p><i>The LEA develops and implements evaluations of the activities carried out with funds. (Perkins V – Sec. 135 (b)(6))</i>  The LEA evaluates annually, using the district’s local adjusted levels of performance and CTE activities in its program. (<a href="#">RCW 28A.700.010</a> and <a href="#">RCW 28A.150.500</a> - Educational agencies offering vocational education programs – local advisory committees)</p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. Copy of all advisory committee meeting minutes for the year under review, including signed attendance. Evidence may include general and/or program specific advisory documentation, depending upon LEA’s CTE program offerings.</p> <p><input type="checkbox"/> B. Complete advisory committee membership roster(s) that reflect(s) representatives from the general and/or program specific business, industry, and community agencies. Evidence must include member names and specific stakeholder group they represent.</p> <p><input type="checkbox"/> C. A signed copy (CTE Director and Advisory Chair signatures required at minimum) of program evaluations for each CTE program offered in the district and proof completion was done in collaboration with the advisory board.</p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A – Limited</p>
<b>12.4</b>	<p><b>Special Populations</b>  <i>The LEA will provide activities to prepare special populations for high-skill, high-wage, or in- demand industry sectors or occupations that will lead to self- sufficiency; prepare students for non-traditional fields; provide equal access for special populations to CTE courses, programs, and programs of study; and ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations. (Perkins V – Sec. 134 (b)(5))</i></p> <p><i>Preparatory courses expand upon exploratory course characteristics in specific and complex ways that demonstrate employment readiness and/or preparation for postsecondary options using state and local programs of study, including opportunities for</i></p>	<p><b>LEA and Building Level</b>  <i>For 12.4.B, provide evidence only of LEA applied and received Perkins funding in the last two years. Please provide evidence for 12.4.A and 12.4.C regardless of Perkins grant funds.</i></p> <p><input type="checkbox"/> A. Copy of class/course level CTE enrollment report for the year under review. Evidence must identify gender, race, and special population status.</p> <p><input type="checkbox"/> B. Evidence of how the district is addressing barriers to enrollment (assurance of equal access) in CTE courses, for special populations (as defined under Perkins V). Evidence must include one of the following:</p> <ul style="list-style-type: none"> <li>• Photographic evidence of modifications, ensuring ADA accommodations are met.</li> <li>• Instructional aids and devices.</li> <li>• Examples of modified</li> </ul>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A – Limited</p>

	<p><i>nontraditional and special populations to receive training. (CTE state program standards)</i></p> <p><i>Special populations defined in Perkins V include:</i></p> <ul style="list-style-type: none"> <li>• <i>Individuals with disabilities.</i></li> <li>• <i>Individuals from economically disadvantaged families, including low-income youth.</i></li> <li>• <i>Individuals preparing for non-traditional fields.</i></li> <li>• <i>English learners.</i></li> <li>• <i>Homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act.</i></li> <li>• <i>Youth who are in, or have aged out, of the foster care system.</i></li> <li>• <i>Youth with a parent who is a member of the armed forces or is on active duty.</i></li> </ul> <p><i>(Perkins V – Sec. 3 (48))</i></p> <p><i>The LEA will incorporate strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations. (Perkins V – Sec. 134 (C) (2)(E)(i))</i></p>	<p>curriculum (I.e., English Learners).</p> <ul style="list-style-type: none"> <li>• Samples of targeted communication to students or families.</li> <li>• Copies of Special Education transition plans.</li> <li>• Samples of targeted career guidance.</li> <li>• Documentation of internship or work experience, or targeted professional development.</li> </ul> <p><input type="checkbox"/> C. Evidence of support offered to CTE students. Evidence must include at least one of the following:</p> <ul style="list-style-type: none"> <li>• Tutorial services.</li> <li>• Language assistance.</li> <li>• Section 504 plans.</li> <li>• Individualized Education Program (IEP).</li> <li>• Achievement evaluations for special populations (Limited English Proficiency, students in foster care, individuals preparing for non-traditional fields, etc.)</li> <li>• Documentation of specialized instructional support personnel or paraprofessionals.</li> </ul>	
12.5	<p><b>Professional Development/CTE Personnel</b></p> <p><i>The LEA supports the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable state certification and licensure requirements, including individuals from groups underrepresented in the teaching profession. (Perkins V - Sec. 135 (b)(2)(c))</i></p> <p><i>The LEA provides professional development programs to teachers, faculty, administrators, specialized instructional support personnel, career guidance and academic counselors or paraprofessionals who are involved in integrated CTE programs and supports education programs for teachers of CTE in public schools and other public school personnel who are involved in the direct delivery of educational services to CTE students, to ensure that such teachers and personnel stay current with all</i></p>	<p><b>LEA and Building Level</b></p> <p><input type="checkbox"/> A. Evidence LEA offered professional development opportunities for teachers, administrators, specialized instructional support personnel, career guidance and academic counselors or paraprofessionals. Evidence may include:</p> <ul style="list-style-type: none"> <li>• School calendar.</li> <li>• District correspondence describing PD opportunity.</li> <li>• Sign in sheets.</li> </ul> <p><input type="checkbox"/> B. List of all staff involved in CTE programs professional development (PD) opportunities (List must include names of LEA staff, staff/ teacher assignment(s), date(s) of the PD, and conference/workshop titles).</p> <p><input type="checkbox"/> C. Evidence that each instructor assigned to CTE course holds a current CTE certificate to teach the identified classes. (Evidence must include list of staff last name, staff first name, certificate number, certificate type, issue date, expiration date, VCode, CIP(s), and local course title. See OSPI CTE CPR 12.5</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A – Limited</p>

	<p>aspects of an industry. (Perkins V - Sec. 135 (b)(2))</p> <p>CTE courses must be taught by properly CTE certified instructors. Conditionally certified teachers must complete a written training plan developed in coordination with the CTE administrator and the CTE advisory committee. (<a href="#">WAC 181-77-014</a>)</p>	<p>Optional Resource.) Note: For courses taught by staff with Conditional Certifications: Evidence of the LEA's basis on which it was determined that the individual(s) is/are competent for the assignment. Evidence may include position posting and advisory committee minutes indicating approval of staff.</p> <p><input type="checkbox"/> D. Proof of a written training plan for any conditionally certified instructor. <i>Note: Professional Growth Plans do not suffice as evidence.</i></p>	
<p><b>12.6</b></p>	<p><b>Leadership, Employability, and Extended Learning Opportunities</b></p> <p><i>The LEA provides students with the skills necessary to pursue careers in high-skill, high-wage, or in demand industry sectors or occupations; (Perkins V- Sec. 135 (3)) which will include work-based learning opportunities, including simulated work environments. (Perkins V – Sec. 135 (b)(5)(E))</i></p> <p><i>The LEA provides students with leadership skill development opportunities available at the local, state, national, and international level, accessed through extended learning opportunities, as defined as learning activities that extend beyond the scheduled school day and/or school year. (<a href="#">CTE state program standards</a>)</i></p> <p><i>Resources will be allocated for the teachers/advisors to manage and supervise leadership activities. (<a href="#">CTE state program standards</a>)</i></p>	<p><b>LEA and Building Level</b></p> <p><input type="checkbox"/> A. List of Career and Technical Student Organizations (CTSOs) and equivalency leadership programs available in the school, identified by course program area and assigned instructor. (<i>See OSPI CTE CPR 12.6 Optional Resource.</i>)</p> <p><input type="checkbox"/> B. For each CTSO: A copy of official membership rosters, official charter letter or paid invoice and a program of work. For any equivalent leadership program: the completed program of work on the required OSPI Equivalency Leadership Template.</p> <p><input type="checkbox"/> C. Documentation of work- based learning opportunities provided to students participating in CTE programs, and documentation that learning is extended into the community. Evidence may include:</p> <ul style="list-style-type: none"> <li>• Signed Training Agreement(s).</li> <li>• Signed Service-Learning Plan(s).</li> <li>• Work-based learning documented hours for placement/unpaid internship, placement/paid internship, ownership/entrepreneurship, health care clinical, etc.</li> </ul> <p><input type="checkbox"/> D. Documentation that resources are allocated for staff coordination of extended learning. Evidence may include:</p> <ul style="list-style-type: none"> <li>• Supplemental contract.</li> <li>• Local bargaining agreement language.</li> <li>• Proof of release period.</li> </ul>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A – Limited</p>

<p><b>12.7</b></p>	<p><b>Post-Secondary Opportunities and Programs of Study</b>  <i>The LEA develops a minimum of one program of study, with curriculum aligned to the requirements for a program of study (Perkins V – Sec. 135 (b)(5)(A). The LEA will provide students participating in CTE programs with the opportunity to gain postsecondary credit while attending high school. (Perkins V – Sec. 134 (b)(7)); 135 (b)(5)(C)</i></p> <p><i>The LEA will provide industry-recognized certification examinations or other assessments leading towards a recognized postsecondary credential. (Perkins V – Sec. 135 (b)(5)(F)</i></p> <p><i>The LEA will demonstrate that all preparatory CTE courses offered by the district meet the requirements of RCW <a href="#">28A.700.030</a>. (RCW <a href="#">28A.700.010</a>)</i></p>	<p><b>LEA and Building Level</b>  <i>For 12.7.B and 12.7.C, provide evidence only if LEA applied and received Perkins funding in the last two years. Please provide evidence for 12.7.A regardless of Perkins grant funds.</i></p> <p><input type="checkbox"/> A. Evidence of dual or concurrent enrollment programs as part of Program of Study. (CTE Dual Credit, AP, College in the High School, Running Start) <i>Note: Signed articulation agreement must match the identified Program of Study in the LEAs Perkins Application.</i>  Evidence includes:</p> <ul style="list-style-type: none"> <li>• Signed Articulation agreement for CTE Dual Credit.</li> <li>• AP Course Audit for AP courses.</li> <li>• College in the High School contract between college and high school.</li> </ul> <p><input type="checkbox"/> B. Program of Study (See optional <a href="#">OPSI Program of Study Template</a>) with current course(s) within the Program of Study identified in the LEA’s Perkins application. (Approval of courses will be cross checked with evidence submitted in 12.2.B).</p> <p><input type="checkbox"/> C. Evidence of opportunity to earn an Industry Recognized Credential (IRC) or dual credit for all preparatory courses.  Evidence may include:</p> <ul style="list-style-type: none"> <li>• Course syllabus.</li> <li>• Course catalogue.</li> <li>• Earned certificate.</li> </ul>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A – Limited</p>
<p><b>12.8</b></p>	<p><b>Materials</b>  <i>Brochures and other printed materials paid for, in whole or in part, with Carl D. Perkins funds will carry a statement indicating the funding source. EDGAR 75.620</i></p>	<p><b>LEA and Building Level</b>  <i>Please provide evidence only of LEA applied and received Perkins funding in the last two years. If not, please Add Comment stating “N/A – Did not receive Perkins.”</i></p> <p><input type="checkbox"/> A. If any materials were published with Perkins funds, evidence that the funding source is cited.</p> <p><input type="checkbox"/> B. N/A – Did not receive Perkins.</p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A – Limited</p>



## CPR Checklist 2020–2021 School Year | Civil Rights – Equity and Civil Rights

For resources and sample materials for each item on the Civil Rights checklist, visit:

<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>.

CPR monitors a LEA’s implementation of critical requirements under state or federal law – it is not an audit or an investigation. A determination of “Compliant” indicates that the reviewer did not identify noncompliance issues related to the specific item number during the review. A “Compliant” determination does not guarantee that the LEA has complied with all requirements under state and federal law.

**Unless noted below (14.4 and 14.6), follow these directions for items requiring building-level evidence:**

- **For on-site reviews**, provide evidence from every building selected for review (see buildings identified in the CPR Review Scheduled letter).
- **For desk reviews**, submit evidence for two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable).

Item	Description	Evidence to Submit	Determination
14.1	<p><b>Compliance Coordinators</b>  <i>The LEA has designated at least one employee to coordinate and monitor the LEA’s compliance with its responsibilities under state nondiscrimination laws, Title IX, and Section 504.</i></p> <p><i>Each civil rights coordinator has received training regarding their responsibilities under these laws.</i></p> <p><b>Guide to Item 14.1:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.8; Section 504, 34 C.F.R. Sec.104.7; Title II, 28 C.F.R. Sec.35.107; RCW 28A.640.010 and 28A.642.010; WAC 392-190-020 and 392-190-060.</p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. Name and title (e.g., superintendent, principal, HR director) for each of the following:</p> <ul style="list-style-type: none"> <li>• Civil Rights Coordinator</li> <li>• Title IX Officer</li> <li>• Section 504 Coordinator</li> </ul> <p><i>(Please also confirm that the LEA has updated the OSPI coordinator contact list: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators</a>)</i></p> <p><input type="checkbox"/> B. Evidence that the Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator have each obtained sufficient training to fulfill their respective responsibilities. Evidence should include training materials, certificates of attendance, agendas, or attestations of self-training (e.g., lists of materials reviewed on OSPI’s Equity and Civil Rights website, along with approximate dates of review).</p> <p><i>A sample self-training checklist is available at:</i>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
		<b>Building Level</b> <input type="checkbox"/> C. ( <i>On-Site Only</i> ) Building staff can identify the LEA’s Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator.	
14.2	<p><b>Nondiscrimination Statement</b>  <i>The LEA provides continuous notice that it does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.</i></p> <p><i>The nondiscrimination statement is included in all major LEA and building publications that are widely disseminated to students, parents, or employees.</i></p> <p><i>The LEA’s nondiscrimination statement includes the following:            Notice that the LEA does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.            Notice that the LEA provides equal access to the Boy Scouts and other designated youth groups.            Contact information for each compliance coordinator (including their name or title, mailing address, email address, and phone number).</i></p> <p><b>Guide to Item 14.2:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec. 100.6; Title IX, 34 C.F.R. Sec. 106.9; Section 504, 34 C.F.R. Sec. 104.8; Title II, 28 C.F.R. Sec. 35.106; Boy Scouts Act, 34 C.F.R. Sec. 108.6; RCW 28A.640.010 and 28A.642.010; WAC 392-190-060.</p>	<p><b>LEA or Building Level</b>            For each of the following publications, please provide a URL or indicate the page number where a complete, current nondiscrimination statement is located:</p> <p><input type="checkbox"/> A. Website.  <input type="checkbox"/> B. Newsletter or a similar publication.  <input type="checkbox"/> C. Student/parent handbook or a similar publication.  <input type="checkbox"/> D. Job announcement or employment application.  <input type="checkbox"/> E. CTE publication, announcement, or student recruitment materials. <i>Please indicate if the district does not have a CTE program.</i>  <input type="checkbox"/> F. Online or ALE program publication, announcement, or recruitment materials. <i>Please indicate if the district does not have an online or ALE program.</i></p>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A <input type="checkbox"/> N/A - Limited

Item	Description	Evidence to Submit	Determination
14.3	<p><b>Complaint Procedures: Discrimination and Sexual Harassment</b></p> <p><i>The LEA has adopted discrimination complaint and appeal procedures and a sexual harassment policy and procedure that are consistent with the requirements in state law (chapter 392-190 WAC, revised December 2014).</i></p> <p><i>The LEA annually notifies all students, parents, and employees about the discrimination complaint procedure and sexual harassment policy in student and employee handbooks. LEAs that do not provide student or employee handbooks otherwise provide this information—in writing—to all students, parents, and employees.</i></p> <p><i>The LEA posts either the OSPI sexual harassment poster or the LEA’s sexual harassment policy in each school building in a location visible to both students and staff.</i></p> <p><i>The LEA has provided training to all administrators and certificated and classroom personnel regarding their responsibilities under civil rights laws and to raise awareness of and eliminate bias based on sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression, gender identity, disability, and the use of a trained dog guide or service animal.</i></p> <p><b>Guide to Item 14.3:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.8; Section 504, 34 C.F.R. Sec.104.7; Title II, 28 C.F.R. Sec.35.107; RCW 28A.640.010, 28A.640.020, and 28A.642.010; WAC 392-190-056, WAC 392-190-057, WAC 392-190-058, WAC 392-190-060, 392-190-065, 392-190-070, and 392-190-075.</p>	<p><b>LEA Level Policies and Procedures</b></p> <p><input type="checkbox"/> A. LEA’s <i>student</i> nondiscrimination policy and procedure (WSSDA’s 3210 and 3210P, or equivalents).</p> <p><input type="checkbox"/> B. LEA’s <i>employee</i> nondiscrimination policy and procedure (WSSDA’s 5010 and 5010P, or equivalents).</p> <p><input type="checkbox"/> C. LEA’s <i>student</i> sexual harassment policy and procedure (WSSDA’s 3205 and 3205P, or equivalents).</p> <p><input type="checkbox"/> D. LEA’s <i>employee</i> sexual harassment policy and procedure (WSSDA’s 5011 and 5011P, or equivalents).</p> <p><b>Building Level Notification</b></p> <p><i>For 14.2.E and 14.2.F, upload only the relevant pages or indicate the page numbers where information about both the LEA’s sexual harassment policy and discrimination complaint procedures are located.</i></p> <p><input type="checkbox"/> E. Student handbook or similar publication.</p> <p><input type="checkbox"/> F. Employee handbook or similar publication.</p> <p><input type="checkbox"/> G. Evidence that the LEA has posted the OSPI Sexual Harassment Poster or the LEA’s sexual harassment policy in a location visible to both students and staff. Evidence should include photos of postings (please indicate location of poster), a signed assurance from Superintendent or designee assuring posting, or visual inspection by OSPI staff for on-site reviews.</p> <p><b>Employee Training</b></p> <p><input type="checkbox"/> H. Evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. Training materials or a summary of topics included in the training, including at a minimum the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and respond to discrimination, and (c) the</li> </ol>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
		<p>LEA's discrimination complaint procedures.</p> <p>2. Sign-in sheets documenting attendance or other attestation that all administrators and certificated and classroom personnel have received the training.</p>	
14.4	<p><b>Section 504</b>  <i>The LEA provides parents with prior written notice, including notice of procedural safeguards, when the LEA takes any action to identify, evaluate, and place students under Section 504. The LEA identifies, evaluates, and places students with disabilities in compliance with Section 504 and has implemented the legal standards under the ADA Amendments Act of 2008 (such as changes regarding major life activities, mitigating measures, etc.).</i></p> <p><i>The LEA receives parental consent before all initial evaluations and initial placements under Section 504.</i></p> <p><i>The LEA ensures that evaluation and placement decisions are made by a group of persons, including persons who are knowledgeable about the student, the meaning of the evaluation data, and placement options.</i></p> <p><i>The LEA provides all necessary accommodations, related aids, and services for students with disabilities, including students with health conditions who may also be served by a health plan.</i></p> <p><i>The LEA conducts manifestation determinations before removing a student with a disability from their current placement because of a behavioral violation.</i></p> <p><b>Guide to Item 14.4:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Section 504, 34 C.F.R. Part 104; RCW 28A.642.010.</p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. The LEA's notice to parents of Section 504 rights/procedural safeguards.</p> <p><input type="checkbox"/> B. Evidence that the LEA conducts manifestation determinations when required for Section 504-eligible students. Evidence must include a description of the LEA's manifestation determination process and any manifestation determination form the LEA uses.</p> <p><b>Building Level</b></p> <p><input type="checkbox"/> C. Section 504 plan documentation, including the following:</p> <ol style="list-style-type: none"> <li>1. Parent consent for initial evaluation.</li> <li>2. Evaluation documentation.</li> <li>3. Parent consent for initial placement.</li> <li>4. Section 504 plans.</li> <li>5. Evidence of manifestation determination meetings (if applicable).</li> </ol> <ul style="list-style-type: none"> <li>• <i>For on-site reviews</i>, the CPR monitor will review student files on site.</li> <li>• <i>For desk reviews</i>, upload documentation for two students at an elementary school, middle/junior high school, high school, online or ALE program, and alternative school (where applicable). Uploaded documentation must include at least one student with a health condition (e.g., diabetes, allergies, etc.).</li> </ul>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
14.5	<p><b>Interpretation and Translation Services</b></p> <p><i>The LEA communicates with all limited-English proficient parents (LEP) in a language they can understand, which includes providing qualified and competent adult interpreters to communicate with LEP parents and translating vital documents when a significant percentage of the population in a school or LEA needs the information in a language other than English.</i></p> <p><i>If there is a small number of parents with particular language needs, or if a school or LEA is unable to translate a document because of undue expense, the LEA still otherwise provides the information to parents in a language they can understand (i.e., through oral interpretation).</i></p> <p><i>The LEA ensures that interpreters and translators have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue and are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.</i></p> <p><b>Guide to Item 14.5:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; <i>Lau v. Nichols</i>, 414 U.S. 563 (1974); RCW 28A.642.010.</p>	<p><b>LEA Level</b>  <b>All LEAs</b></p> <p><i>Submit this item even if the LEA has not identified any limited-English proficient (LEP) parents.</i></p> <p><input type="checkbox"/> A. Evidence or a description of the process the LEA uses to identify LEP parents, including a home language survey or questions about home language on a student enrollment form.</p> <p><b>LEA and Building Level</b>  <b>LEAs with One or More LEP Parent</b></p> <p><i>If an LEA has identified LEP parents, the LEA must provide the following:</i></p> <p><input type="checkbox"/> B. A description of the process the LEA uses to ensure that interpretation and translation services are provided to communicate vital information with LEP parents, including at least the following:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the LEA determines which language(s) to translate documents into.</li> <li>4. How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p><input type="checkbox"/> C. A description of the process the LEA uses to ensure that interpreters and translators, including LEA or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents.</p> <p><input type="checkbox"/> D. N/A – The LEA has not identified any LEP families (applies to B and C).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
14.6	<p><b>English Language Development Services</b>  <i>The LEA provides English language development (ELD) services to English Learners (EL) – national origin minority students with limited-English proficiency.</i></p> <p><i>The LEA has a process to identify, assess, and place EL students, which includes a home language survey and provisions for testing students on the state language proficiency assessment.</i></p> <p><i>The LEA’s ELD services are based on a sound educational theory and have been implemented effectively, including qualified staff and adequate resources and facilities.</i></p> <p><i>The LEA evaluates the program’s effectiveness and makes modifications as needed.</i></p> <p><b>Guide to Item 14.6:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec. 100.3; <i>Lau v. Nichols</i>, 414 U.S. 563 (1974); <i>Castañeda v. Pickard</i>, 648 F.2d 989 (5th Cir. 1981); Chapter 28A.642 RCW and 392-190 WAC.</p>	<p><b>LEA or Building Level</b>  <i>For LEAs that receive Title III or TBIP funding, OSPI reviews this documentation under Title III/TBIP (CPR Checklist 7) – no additional documentation is required for this item.</i></p> <p><i>All LEAs that do not receive Title III or TBIP funding must complete the following items:</i></p> <p><input type="checkbox"/> A. Evidence that the LEA identifies the language background of each student upon enrollment (including the first language learned, the language the student uses most often, and the language used in the home). Evidence should include a home language survey or student enrollment form with the required questions.</p> <p><input type="checkbox"/> B. Assessment and placement procedures for ELD services, including testing on the state language proficiency assessment and criteria for determining eligibility and exit.</p> <p><input type="checkbox"/> C. A roster of eligible EL students, indicating language proficiency level and the type and amount of ELD services provided for each student.</p> <p><i>If LEA has identified EL students, respond to D, E, F, and G.</i></p> <p><input type="checkbox"/> D. A list of all teachers who design, oversee, and evaluate ELD services. For each teacher listed, provide their qualifications to provide EL services, such as EL/ESL endorsement or ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> E. A list of all paraeducators who assist in providing ELD services. For each paraeducator listed, provide evidence that they instruct under the direct supervision of a qualified teacher and receive ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> F. Student files with completed home language survey, placement test, and annual language proficiency assessment score sheets.</p> <ul style="list-style-type: none"> <li>• For <i>on-site reviews</i>, upload documentation from <i>two</i> students at each of the buildings selected for</li> </ul>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
		<p>review and any ALE or online program, where applicable.</p> <ul style="list-style-type: none"> <li>• For <i>desk reviews</i>, upload documentation from <i>two</i> students at an elementary school, middle/junior high school, high school, ALE or online program, and alternative school, where applicable.</li> </ul> <p><input type="checkbox"/> G. Evidence of evaluation of the effectiveness of the LEA’s ELD services (e.g., progress made in language acquisition and academic achievement, feedback from teachers and parents, meeting minutes, etc.).</p> <p><input type="checkbox"/> H. N/A – The LEA has not identified any EL students (applies to C, D, E, F, and G). <i>Please Add Comment to this item stating grounds for N/A.</i></p>	
14.7	<p><b>National Origin and Immigration Status (Student Enrollment and Registration)</b></p> <p><i>The LEA does not discourage or prevent a student from enrolling because they lack a birth certificate or have records indicating a foreign place of birth. The LEA accepts a variety of documents to establish a student’s age and residency.</i></p> <p><i>The LEA does not inquire about a student’s or parent’s U.S. citizenship status or immigration status. If the LEA requests a student’s or parent’s social security number, the LEA (1) informs the individual that disclosure is voluntary, (2) provides the statutory or other legal basis for why the LEA is requesting the number, and (3) explains how the LEA will use the number.</i></p> <p><b>Guide to Item 14.7:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec. 100.3; RCW 28A.642.010; Plyler v. Doe, 457 U.S. 202 (1982).</p>	<p><b>LEA and Building Level</b></p> <p><input type="checkbox"/> A. All LEA and building-level student enrollment forms and packets (including cover sheets), and any new student registration information, whether available in hardcopy or online format, in English and any translated versions the LEA uses.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>
14.8	<p><b>Course and Program Enrollment</b></p> <p><i>To ensure the LEA does not discriminate in the counseling and guidance of students, the LEA at least annually reviews disaggregated course and program enrollment data to identify disproportionalities based on sex, race,</i></p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. A description of the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address disproportionalities based on sex, race, EL status, special</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
	<p><i>EL status, and disability (special education and Section 504).</i></p> <p><i>The review should include honors and advanced placement courses, career and technical education, highly capable programs, online programs, specialized programs, etc.</i></p> <p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.8:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec. 106.36; Section 504, 34 C.F.R. Sec. 104.34; Title VI, 34 C.F.R. Sec. 100.3; RCW 28A.640.020 and 28A.642.010; WAC 392-190-010.</p>	<p>education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. Which course and programs are reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).</li> </ol> <p><input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI course enrollment data.</i></p>	



Item	Description	Evidence to Submit	Determination
14.9	<p><b>Student Discipline</b>  <i>To ensure the LEA does not discriminate in the administration of student discipline, the LEA at least annually reviews disaggregated discipline data to identify disproportionalities based on sex, race, EL-status, and disability (special education and Section 504).</i></p> <p><i>At a minimum, the review should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions.</i></p> <p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.9:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 35 C.F.R. Sec. 100.3; Section 504, 34 C.F.R. Sec. 104.4; Title IX; 34 C.F.R. Sec. 106.31; RCW 28A.640.010; RCW 28A.642.010; and WAC 392-190-048.</p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. A description of the process the LEA uses to annually review disaggregated student discipline data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. What data is reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Student discipline data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e.</i>, root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</li> </ol>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

Item	Description	Evidence to Submit	Determination
		<input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI student discipline data.</i>	
14.10	<p><b>Accommodating Student Interests and Abilities (Three-Part Test)</b>  <i>Each building that offers an interscholastic athletic program equally accommodates the interests and abilities of male and female students as demonstrated in one of the following ways (“Three-Part Test”):</i></p> <ol style="list-style-type: none"> <li>1. <i>The ratio of male/female student enrollment is substantially proportionate to the ratio of male/female athletic participation,</i></li> <li>2. <i>The school has a history and continuing pattern of program expansion for the underrepresented sex, or</i></li> <li>3. <i>The school’s current program fully and effectively accommodates the interests and abilities of the underrepresented sex as demonstrated by the athletic interest survey and other requests for specific sports.</i></li> </ol> <p><i>The LEA administers the OSPI student athletic interest survey at least once every three years at each building that offers interscholastic athletics.</i></p> <p><i>The LEA disaggregates and summarizes its survey results by sex and by building and considers these results when planning and developing which recreational and athletic activities to offer and when determining whether equal opportunities are available to members of both sexes.</i></p> <p><b>Guide to Item 14.10:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec. 106.41; RCW 28A.640.020; WAC</p>	<p><b>Building Level</b>  <i>If your LEA operates, sponsors, or provides interscholastic athletics, submit the following items.</i></p> <input type="checkbox"/> A. A complete copy of the student athletic interest survey instrument, and date it was last administered. <input type="checkbox"/> B. Survey results for each building, with student responses <i>disaggregated by sex</i> (use the sample summary worksheet or equivalent), including at a minimum: <ol style="list-style-type: none"> <li>1. The number of students surveyed.</li> <li>2. The number of students enrolled (i.e., eligible to take the survey).</li> <li>3. The top five sports requested, including the number of students who expressed interest in each sport.</li> <li>4. The top reasons for non-participation.</li> </ol> <p><i>Download the sample summary worksheet here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx</a>.</p> <input type="checkbox"/> C. A completed Three-Part Test analysis for each building, using the OSPI’s Athletic Opportunities Tool. <p><i>Download the tool and instructions here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunities.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunities.zip</a>.</p> <input type="checkbox"/> D. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. <i>Please Add Comment to this item stating grounds for N/A.</i>	<input type="checkbox"/> Compliant <input type="checkbox"/> Action Plan Approved <input type="checkbox"/> Evidence Needed <input type="checkbox"/> Noncompliant <input type="checkbox"/> N/A <input type="checkbox"/> N/A - Limited

Item	Description	Evidence to Submit	Determination
	392-190-030, 392-190-035, 392-190-040, and 392-190-045.		
14.11	<p><b>Annual Athletic Evaluation</b>  <i>The LEA provides equal opportunities and benefits for male and female students to participate in athletics. Each building that offers an athletic program conducts an annual evaluation of its athletic program to ensure that the overall benefits and treatment of the boys' and girls' athletic programs are comparable, considering the following factors:</i></p> <ul style="list-style-type: none"> <li>• Accommodation of interests and abilities (already addressed via Item 14.10)</li> <li>• Coaching and tutoring</li> <li>• Equipment and supplies</li> <li>• Scheduling</li> <li>• Facilities</li> <li>• Medical services and training</li> <li>• Publicity and awards</li> <li>• Travel and per diem</li> </ul> <p><i>The LEA has a process in place to ensure that outside sources of athletics funding (i.e., fundraisers, donations, or booster club activities) do not result in disparities in benefits or treatment between the girls' and boys' programs.</i></p> <p><i>If fundraising or donations result in a disparity along gender lines, the LEA corrects the disparity, using its own funds if needed.</i></p> <p><b>Guide to Item 14.11:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec. 106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.</p>	<p><b>LEA or Building Level</b>  <i>If your LEA operates, sponsors, or provides interscholastic, club, or intramural athletics, submit the following items.</i></p> <p><input type="checkbox"/> A. A description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.</p> <p><input type="checkbox"/> C. If the athletic evaluation for the 2018–19 or 2019–20 school year identified disparities that favor one sex at any building, evidence that the LEA or building is taking effective steps to correct the disparity. <i>If no disparities were identified, please Add Comment to this item stating grounds for N/A.</i></p> <p><input type="checkbox"/> D. A description of the LEA's process to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.</p> <p><input type="checkbox"/> E. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. <i>Please Add Comment to this item stating grounds for N/A.</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

## CPR Checklist 20212022 School Year | Civil Rights – Equity and Civil Rights

For resources and sample materials for each item on the Civil Rights checklist, visit :

<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>.

CPR monitors a LEA’s implementation of critical requirements under state or federal law – it is not an audit or an investigation. A determination of “Compliant” indicates that the reviewer did not identify noncompliance issues related to the specific item number during the review. A “Compliant” determination does not guarantee that the LEA has complied with all requirements under state and federal law.

**Unless noted below (14.4 and 14.6), please follow these directions for items requiring building-level evidence:**

- **For on-site reviews**, provide evidence from every building selected for review (see buildings identified in the CPR Review Scheduled letter).
- **For desk reviews**, submit evidence for any two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable).

Item	Description	Evidence to Submit	Determination
14.1	<p><b>Compliance Coordinators</b>  <i>The LEA has designated at least one employee to coordinate and monitor the LEA’s compliance with its responsibilities under state nondiscrimination laws, Title IX, and Section 504.</i></p> <p><i>Each civil rights coordinator has received training regarding their responsibilities under these laws.</i></p> <p><b>Guide to Item 14.1:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec. 106.8; Section 504, 34 C.F.R. Sec. 104.7; Title II, 28 C.F.R. Sec. 35.107; RCW 28A.640.010 and 28A.642.010; WAC 392-190-020 and 392-190-060.</p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. Name and title (e.g., superintendent, principal, HR director) for each of the following:</p> <ul style="list-style-type: none"> <li>• Civil Rights Coordinator</li> <li>• Title IX Officer</li> <li>• Section 504 Coordinator</li> </ul> <p>Please also confirm that the LEA has updated the online OSPI coordinator contact list:  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators</a>.</p> <p><input type="checkbox"/> B. Evidence that the Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator have each obtained sufficient training to fulfill their respective responsibilities. Evidence should include training materials, certificates of attendance, agendas, or attestations of self-training (e.g., lists of materials reviewed on OSPI’s Equity and Civil Rights website, along with approximate dates of review). A sample self-training checklist for each Coordinator role is available at:  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators/compliance-coordinator">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators/compliance-coordinator</a></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

		<p><b>Building Level</b></p> <p><input type="checkbox"/> C. (On-Site Only) Building staff can identify the LEA's Civil Rights Coordinator, Title IX Officer, and Section 504 Coordinator.</p>	
14.2	<p><b>Nondiscrimination Statement</b></p> <p><i>The LEA provides continuous notice that it does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.</i></p> <p><i>The nondiscrimination statement is included in all major LEA and building publications that are widely disseminated to students, parents, or employees.</i></p> <p><i>The LEA's nondiscrimination statement includes the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Notice that the LEA does not discriminate based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, creed, religion, age, veteran or military status, disability, or the use of a trained dog guide or service animal by a person with a disability.</i></li> <li>• <i>Notice that the LEA provides equal access to the Boy Scouts and other designated youth groups.</i></li> <li>• <i>Contact information for each compliance coordinator (including their name or title, mailing address, email address, and phone number).</i></li> </ul> <p><b>Guide to Item 14.2:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec. 100.6; Title IX, 34 C.F.R. Sec. 106.9; Section 504, 34 C.F.R. Sec. 104.8; Title II, 28 C.F.R. Sec. 35.106; Boy Scouts Act, 34 C.F.R. Sec. 108.6; RCW 28A.640.010 and 28A.642.010; WAC 392-190-060.</p>	<p><b>LEA or Building Level</b></p> <p>For each of the following publications, please either provide a URL or indicate the page number where a complete, current nondiscrimination statement is located:</p> <p><input type="checkbox"/> A. Website.</p> <p><input type="checkbox"/> B. Newsletter or a similar publication.</p> <p><input type="checkbox"/> C. Student/parent handbook or a similar publication.</p> <p><input type="checkbox"/> D. Job announcement or employment application.</p> <p><input type="checkbox"/> E. CTE publication, announcement, or student recruitment materials. <i>Please indicate if the district does not have a CTE program.</i></p> <p><input type="checkbox"/> F. Online or ALE program publication, announcement, or recruitment materials. <i>Please indicate if the district does not have an online or ALE program.</i></p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

<p>14.3</p>	<p><b>Complaint Procedures: Discrimination and Sexual Harassment</b>  <i>The LEA has adopted discrimination complaint and appeal procedures and a sexual harassment policy and procedure that are consistent with the requirements in state law (chapter 392-190 WAC, revised December 2014).</i></p> <p><i>The LEA annually notifies all students, parents, and employees about the discrimination complaint procedure and sexual harassment policy in student and employee handbooks. LEAs that do not provide student or employee handbooks otherwise provide this information—in writing—to all students, parents, and employees.</i></p> <p><i>The LEA posts either the OSPI sexual harassment poster or the LEA’s sexual harassment policy in each school building in a location visible to both students and staff.</i></p> <p><i>The LEA has provided training to all administrators and certificated and classroom personnel regarding their responsibilities under civil rights laws and to raise awareness of and eliminate bias based on sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression, gender identity, disability, and the use of a trained dog guide or service animal.</i></p> <p><b>Guide to Item 14.3:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.8; Section 504, 34 C.F.R. Sec.104.7; Title II, 28 C.F.R. Sec.35.107; RCW 28A.640.010, 28A.640.020, and 28A.642.010; WAC 392-190-056, WAC 392-190-057, WAC 392-190-058, WAC 392-190-060, 392-190-065, 392-190-070, and 392-190-075.</p>	<p><b>LEA Level Policies and Procedures</b></p> <p><input type="checkbox"/> A. LEA’s student nondiscrimination policy and procedure (WSSDA’s 3210 and 3210P, or equivalents).</p> <p><input type="checkbox"/> B. LEA’s employee nondiscrimination policy and procedure (WSSDA’s 5010 and 5010P, or equivalents).</p> <p><input type="checkbox"/> C. LEA’s student sexual harassment policy and procedure (WSSDA’s 3205 and 3205P, or equivalents).</p> <p><input type="checkbox"/> D. LEA’s employee sexual harassment policy and procedure (WSSDA’s 5011 and 5011P, or equivalents).</p> <p><b>Building Level Notification</b>  <i>For 14.2.E and 14.2.F, upload either the relevant pages or indicate the page numbers where information about both the LEA’s sexual harassment policy and discrimination complaint procedures is located.</i></p> <p><input type="checkbox"/> E. Student handbook or similar publication.</p> <p><input type="checkbox"/> F. Employee handbook or similar publication.</p> <p><input type="checkbox"/> G. Evidence that the LEA has posted the OSPI Sexual Harassment Poster or the LEA’s sexual harassment policy in a location visible to both students and staff. Evidence should include photos of postings (please indicate location of poster), a signed assurance from Superintendent or designee assuring posting, or visual inspection by OSPI staff for on- site reviews.</p> <p><b>Employee Training</b></p> <p><input type="checkbox"/> H. Evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. Training materials or a summary of topics included in the training, including at a minimum the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and respond to discrimination, and</li> </ol>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>
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		<p>(c) the LEA's discrimination complaint procedures.</p> <p>2. Sign-in sheets documenting attendance or other attestation that all administrators and certificated and classroom personnel have received the training.</p>	
14.4	<p><b>Section 504</b>  <i>The LEA provides parents with prior written notice, including notice of procedural safeguards, when the LEA takes any action to identify, evaluate, and place students under Section 504.</i></p> <p><i>The LEA identifies, evaluates, and places students with disabilities in compliance with Section 504 and has implemented the legal standards under the ADA Amendments Act of 2008 (such as changes regarding major life activities, mitigating measures, etc.).</i></p> <p><i>The LEA receives parental consent before all initial evaluations and initial placements under Section 504.</i></p> <p><i>The LEA ensures that evaluation and placement decisions are made by a group of persons, including persons who are knowledgeable about the student, the meaning of the evaluation data, and placement options.</i></p> <p><i>The LEA provides all necessary accommodations, related aids, and services for students with disabilities, including students with health conditions who may also be served by a health plan.</i></p> <p><i>The LEA conducts manifestation determinations before removing a student with a disability from their current placement because of a behavioral violation.</i></p> <p><b>Guide to Item 14.4:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Section 504, 34 C.F.R. Part 104; RCW 28A.642.010.</p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. The LEA's notice to parents of Section 504 rights/procedural safeguards.</p> <p><input type="checkbox"/> B. Evidence that the LEA conducts manifestation determinations when required for Section 504-eligible students.  Evidence must include (1) a description of the LEA's manifestation determination process and (2) any manifestation determination form the LEA uses.</p> <p>Building Level</p> <p><input type="checkbox"/> C. Section 504 plan documentation, including the following:</p> <ol style="list-style-type: none"> <li>1. Parent consent for initial evaluation.</li> <li>2. Evaluation documentation.</li> <li>3. Parent consent for initial placement.</li> <li>4. Section 504 plans.</li> <li>5. Evidence of manifestation determination meetings (if applicable).</li> </ol> <ul style="list-style-type: none"> <li>• For on-site reviews, the CPR monitor will review student files on site.</li> <li>• For desk reviews, upload documentation for two students at an elementary school, middle/junior high school, high school, online or ALE program, and alternative school (where applicable). Uploaded documentation must include at least one student with a health condition (e.g., diabetes, allergies, etc.).</li> </ul>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>

14.5	<p><b>Interpretation and Translation Services</b>  <i>The LEA communicates with all limited-English proficient parents (LEP) in a language they can understand, which includes providing qualified and competent adult interpreters to communicate with LEP parents and translating vital documents when a significant percentage of the population in a school or LEA needs the information in a language other than English.</i></p> <p><i>If there is a small number of parents with particular language needs, or if a school or LEA is unable to translate a document because of undue expense, the LEA still otherwise provides the information to parents in a language they can understand (i.e., through oral interpretation).</i></p> <p><i>The LEA ensures that interpreters and translators have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue and are trained on the role of an interpreter and translator, the ethics of interpreting and translating, and the need to maintain confidentiality.</i></p> <p><b>Guide to Item 14.5:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; Lau v. Nichols, 414 U.S. 563 (1974); RCW 28A.642.010.</p>	<p><b>LEA Level</b>  <b>All LEAs</b>  <i>Submit this item even if the LEA has not identified any limited- English proficient (LEP) parents.</i></p> <p><input type="checkbox"/> A. Evidence or a description of the process the LEA uses to identify LEP parents, including a home language survey or questions about home language on a student enrollment form.</p> <p><b>LEA and Building Level LEAs with One or More LEP Parent</b>  <i>If an LEA has identified LEP parents, the LEA must provide the following:</i></p> <p><input type="checkbox"/> B. A description of the process the LEA uses to ensure that interpretation and translation services are provided to communicate vital information with LEP parents, including at least the following:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the LEA determines which language(s) to translate documents into.</li> <li>4. How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p><input type="checkbox"/> C. A description of the process the LEA uses to ensure that interpreters and translators, including LEA or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents.</p> <p><input type="checkbox"/> D. N/A – The LEA has not identified any LEP families (applies to B and C).</p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>
14.6	<p><b>English Language Development Services</b>  <i>The LEA provides English language development (ELD) services to English Learners (EL) – national origin minority students with limited-English proficiency.</i></p>	<p><b>LEA or Building Level</b>  <i>For LEAs that receive Title III or TBIP funding, OSPI reviews this documentation under Title III/TBIP (CPR Checklist 7) – no additional documentation is required for this</i></p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>



<p><i>The LEA has a process to identify, assess, and place EL students, which includes a home language survey and provisions for testing students on the state language proficiency assessment.</i></p> <p><i>The LEA's ELD services are based on a sound educational theory and have been implemented effectively, including qualified staff and adequate resources and facilities.</i></p> <p><i>The LEA evaluates the program's effectiveness and makes modifications as needed.</i></p> <p><b>Guide to Item 14.6:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; <i>Lau v. Nichols</i>, 414 U.S. 563 (1974); <i>Castañeda v. Pickard</i>, 648 F.2d 989 (5th Cir. 1981); Chapter 28A.642 RCW and 392-190 WAC.</p>	<p><i>item.</i></p> <p><i>LEAs that do not receive Title III or TBIP funding must complete the following items:</i></p> <p><input type="checkbox"/> A. Evidence that the LEA identifies the language background of each student upon enrollment (including the first language learned, the language the student uses most often, and the language used in the home). Evidence should include a home language survey or student enrollment form with the required questions.</p> <p><input type="checkbox"/> B. Assessment and placement procedures for ELD services, including testing on the state language proficiency assessment and criteria for determining eligibility and exit.</p> <p><input type="checkbox"/> C. A roster of eligible EL students, indicating language proficiency level and the type and amount of ELD services provided for each student.</p> <p><i>If LEA has identified EL students, respond to D, E, F, and G.</i></p> <p><input type="checkbox"/> D. A list of all teachers who design, oversee, and evaluate ELD services. For each teacher listed, provide their qualifications to provide EL services, such as EL/ESL endorsement or ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> E. A list of all paraeducators who assist in providing ELD services. For each paraeducator listed, provide evidence that they instruct under the direct supervision of a qualified teacher and receive ongoing training relating to the delivery of ELD services.</p> <p><input type="checkbox"/> F. Student files with completed home language survey, placement test, and annual language proficiency assessment score sheets.</p> <ul style="list-style-type: none"> <li>• For <i>on-site reviews</i>, upload documentation from two students at each of the buildings selected for review and any ALE or online program, where applicable.</li> <li>• For <i>desk reviews</i>, upload documentation from two students at an elementary school,</li> </ul>	
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		<p>middle/junior high school, high school, ALE or online program, and alternative school, where applicable.</p> <p><input type="checkbox"/> G. Evidence of evaluation of the effectiveness of the LEA's ELD services (e.g., progress made in language acquisition and academic achievement, feedback from teachers and parents, meeting minutes, etc.).</p> <p><input type="checkbox"/> H. N/A – The LEA has not identified any EL students (applies to C, D, E, F, and G). Please Add Comment to <i>this item stating grounds for N/A</i>.</p>	
14.7	<p><b>National Origin and Immigration Status (Student Enrollment and Registration)</b>  <i>The LEA does not discourage or prevent a student from enrolling because they lack a birth certificate or have records indicating a foreign place of birth. The LEA accepts a variety of documents to establish a student's age and residency.</i></p> <p><i>The LEA does not inquire about a student's or parent's U.S. citizenship status or immigration status. If the LEA requests a student's or parent's social security number, the LEA (1) informs the individual that disclosure is voluntary, (2) provides the statutory or other legal basis for why the LEA is requesting the number, and (3) explains how the LEA will use the number.</i></p> <p><b>Guide to Item 14.7:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 34 C.F.R. Sec.100.3; RCW 28A.642.010; Plyler v. Doe, 457 U.S. 202 (1982).</p>	<p><b>LEA and Building Level</b></p> <p><input type="checkbox"/> A. All LEA and building-level student enrollment forms and packets (including cover sheets), and any new student registration information, whether available in hardcopy or online format, in English and any translated versions the LEA uses.</p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>
14.8	<p><b>Course and Program Enrollment</b>  <i>To ensure the LEA does not discriminate in the counseling and guidance of students, the LEA at least annually reviews disaggregated course and program enrollment data to identify disproportionalities based on sex, race, EL status, and disability (special education and Section 504).</i></p> <p><i>The review should include honors and advanced placement courses, career and technical education, highly capable programs, online programs, specialized programs, etc.</i></p>	<p><b>LEA or Building Level</b></p> <p>A. A description of the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. Which course and programs are reviewed.</li> <li>5. How the LEA or building</li> </ol>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>

	<p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.8:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.36; Section 504, 34 C.F.R. Sec.104.34; Title VI, 34 C.F.R. Sec.100.3; RCW 28A.640.020 and 28A.642.010; WAC 392-190-010.</p>	<p>determines whether disproportionalities exist.</p> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2020–21 or 2021–22 school year. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).</li> </ol> <p><input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI course enrollment data</i></p>	
14.9	<p><b>Student Discipline</b></p> <p><i>To ensure the LEA does not discriminate in the administration of student discipline, the LEA at least annually reviews disaggregated discipline data to identify disproportionalities based on sex, race, EL-status, and disability (special education and Section 504).</i></p> <p><i>At a minimum, the review should include suspensions (both in- school, short-term, and long- term), expulsions, and</i></p>	<p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> A. A description of the process the LEA uses to annually review disaggregated student discipline data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must specify the following:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the</li> </ol>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>

<p>emergency expulsions.</p> <p><i>If the review identifies a substantial disproportionality, the LEA takes prompt action to ensure it is not the result of discrimination.</i></p> <p><b>Guide to Item 14.9:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title VI, 35 C.F.R. Sec.100.3; Section 504, 34 C.F.R. Sec.104.4; Title IX; 34 C.F.R. Sec.106.31; RCW 28A.640.010; RCW 28A.642.010; and WAC 392-190-048.</p>	<p>reviews.</p> <ol style="list-style-type: none"> <li>3. How the reviews are documented.</li> <li>4. What data is reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p><b>Building Level</b></p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2020–21 or 2021–22 school year.</p> <p>Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. Student discipline data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of identified disproportionalities.</li> </ol> <p><input type="checkbox"/> C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e.</i>, root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</li> </ol> <p><input type="checkbox"/> D. N/A – No disproportionalities were identified (applies to C). <i>Please Add Comment to this item stating grounds for N/A. CPR monitors may cross-reference with OSPI student discipline data.</i></p>	
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<p>14.10</p>	<p><b>Accommodating Student Interests and Abilities (Three- Part Test)</b>  <i>Each building that offers an interscholastic athletic program equally accommodates the interests and abilities of male and female students as demonstrated in one of the following ways ("Three-Part Test"):</i></p> <ol style="list-style-type: none"> <li>1. <i>The ratio of male/female student enrollment is substantially proportionate to the ratio of male/female athletic participation,</i></li> <li>2. <i>The school has a history and continuing pattern of program expansion for the underrepresented sex, or</i></li> <li>3. <i>The school's current program fully and effectively accommodates the interests and abilities of the underrepresented sex as demonstrated by the athletic interest survey and other requests for specific sports.</i></li> </ol> <p><i>The LEA administers the OSPI student athletic interest survey at least once every three years at each building that offers interscholastic athletics.</i></p> <p><i>The LEA disaggregates and summarizes its survey results by sex and by building and considers these results when planning and developing which recreational and athletic activities to offer and when determining whether equal opportunities are available to members of both sexes.</i></p>	<p><b>Building Level</b>  <i>If your LEA operates, sponsors, or provides interscholastic athletics, submit the following items.</i></p> <p><input type="checkbox"/> A. A complete copy of the student athletic interest survey instrument, and date it was last administered.</p> <p><input type="checkbox"/> B. Survey results for each building, with a summary of student responses disaggregated by sex (use the sample summary worksheet or equivalent), including at a minimum:</p> <ol style="list-style-type: none"> <li>1. The number of students surveyed.</li> <li>2. The number of students enrolled (i.e., eligible to take the survey).</li> <li>3. The top five sports requested, including the number of students who expressed interest in each sport.</li> <li>4. The top reasons for non-participation.</li> </ol> <p><i>Download the sample summary worksheet here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultsummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultsummary.docx</a>.</p> <p><input type="checkbox"/> C. A completed Three-Part Test analysis for each building, using the OSPI's Athletic Opportunities Tool.</p> <p><i>Download the tool and instructions here:</i>  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a>.</p> <p><input type="checkbox"/> D. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. Please Add Comment <i>to this item stating grounds for N/A.</i></p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>
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<p>14.11</p>	<p><b>Annual Athletic Evaluation</b>  <i>The LEA provides equal opportunities and benefits for male and female students to participate in athletics. Each building that offers an athletic program conducts an annual evaluation of its athletic program to ensure that the overall benefits and treatment of the boys' and girls' athletic programs are comparable, considering the following factors:</i></p> <ul style="list-style-type: none"> <li>• Accommodation of interests and abilities (already addressed via Item 14.10)</li> <li>• Coaching and tutoring</li> <li>• Equipment and supplies</li> <li>• Scheduling</li> <li>• Facilities</li> <li>• Medical services and training</li> <li>• Publicity and awards</li> <li>• Travel and per diem</li> </ul> <p><i>The LEA has a process in place to ensure that outside sources of athletics funding (i.e., fundraisers, donations, or booster club activities) do not result in disparities in benefits or treatment between the girls' and boys' programs.</i></p> <p><i>If fundraising or donations result in a disparity along gender lines, the LEA corrects the disparity, using its own funds if needed.</i></p> <p><b>Guide to Item 14.11:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106.41; RCW 28A.640.020; WAC 392-190-030, 392-190-035, 392-190-040, and 392-190-045.</p>	<p><b>LEA or Building Level</b>  <i>If your LEA operates, sponsors, or provides interscholastic, club, or intramural athletics, submit the following items.</i></p> <p><input type="checkbox"/> A. A description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p><input type="checkbox"/> B. Evidence of implementation of the above process for the 2020–21 or 2021–22 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.</p> <p><input type="checkbox"/> C. If the athletic evaluation for the 2020–21 or 2021–22 school year identified disparities that favor one sex at any building, evidence that the LEA or building is taking effective steps to correct the disparity. <i>If no disparities were identified, please Add Comment to this item stating grounds for N/A.</i></p> <p><input type="checkbox"/> D. A description of the LEA's process to ensure that outside sources of athletic funding— including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.</p> <p><input type="checkbox"/> E. N/A – The LEA does not operate, sponsor, or provide interscholastic athletics. <i>Please Add Comment to this item stating grounds for N/A.</i></p>	<p><input type="checkbox"/> Compliant  <input type="checkbox"/> Action Plan Approved  <input type="checkbox"/> Evidence Needed  <input type="checkbox"/> Noncompliant  <input type="checkbox"/> N/A  <input type="checkbox"/> N/A - Limited</p>
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<p>14.12</p>	<p><b>Gender-Inclusive Schools</b></p> <p><i>The LEA has adopted a gender- inclusive schools (or transgender students) policy and procedure that, at a minimum, incorporates all the elements of the WSSDA model Gender-Inclusive Schools policy and procedure, 3211 and 3211P.</i></p> <p><i>The LEA has designated a primary contact regarding the gender- inclusive schools policy. The primary contact must attend at least one OSPI training regarding harassment, intimidation, and bullying, and gender-inclusive schools.</i></p> <p><i>The LEA shares this policy and procedure with students, parents, volunteers, and employees.</i></p> <p><b>Guide to Item 14.12:</b>  <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program- review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program- review-civil-rights</a></p> <p><b>Legal authority:</b> Title IX, 34 C.F.R. Sec.106; RCW 28A.642.020 and 28A.642.080.</p>	<p><b>LEA Level</b></p> <p><input type="checkbox"/> A. LEA’s gender-inclusive schools policy and procedure (WSSDA’s 3211 and 3211P, or equivalents).</p> <p><input type="checkbox"/> B. Name and title (e.g., superintendent, principal, HR director) for the Gender-Inclusive Schools Coordinator</p> <p><input type="checkbox"/> C. Evidence that the Gender-Inclusive Schools Coordinator has attended (in person or online) an OSPI training on harassment, intimidation, and bullying, and gender-inclusive schools. Evidence should include training materials, certificates of attendance, or agendas.</p> <p><b>LEA or Building Level</b></p> <p><input type="checkbox"/> D. Evidence that the LEA has shared its gender-inclusive schools policy with students, parents, volunteers, and employees (e.g., published in student and employee handbooks).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Action Plan Approved</p> <p><input type="checkbox"/> Evidence Needed</p> <p><input type="checkbox"/> Noncompliant</p> <p><input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A - Limited</p>
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**Part C: Subrecipients:**

A list of subrecipients for which OSPI conducted compliance reviews.

2018–2019 School Year	
Subrecipient (LEA)	Method (Desk Review)
Lopez School District (2018–19, 2019–20)	Began: March 27, 2019 Closed: March 30, 2022
2019–2020 School Year	
Subrecipient (LEA)	Method (Desk Review)
Central Kitsap School District	Began: January 16, 2020 Closed: May 5, 2021
Colville School District	Began: January 16, 2020 Closed: September 18, 2020
Mead School District	Began: January 16, 2020 Closed: March 17, 2021
North Kitsap School District	Began: January 16, 2020 Closed: March 18, 2021
East Valley School District (Spokane)	Began: January 23, 2020 Closed: March 29, 2021
Medical Lake School District	Began: January 23, 2020 Closed: March 22, 2021
Sequim School District	Began: January 23, 2020 Closed: April 1, 2022
LaCrosse School District	Began: March 5, 2020 Closed: June 10, 2020
Liberty School District	Began: March 5, 2020 Closed: March 28, 2022
Odessa School District (Moved to 2020–21)	Began: February April 23, 2020 Revised Schedule Update: April 20, 2021 Closed: September 27, 2021
Reardan-Edwall School District	Began: April 23, 2020 Closed: April 22, 2022
Lind School District (Moved to 2020–21)	Began: May 19, 2020 Revised Date: May 18, 2021 Closed: April 8, 2022
Ritzville School District (Moved to 2020–21)	Began: May 19, 2020 Review Schedule Update: May 18, 2021 Closed: April 22, 2022



Note: October 6, 2020 – OSPI’s 2020–21 School Year Formal Monitoring Update. Bulletin: [B083–20 Executive Services](#)

**2020–2021 School Year**

<b>Subrecipient (LEA)</b>	<b>Method (Desk Review)</b>
Odessa School District	Began: February April 23, 2020 Revised Schedule Update: April 20, 2021 Closed: September 27, 2021
Lind School District	Began: May 19, 2020 Revised Schedule Update: May 18, 2021 Closed: April 8, 2022
Ritzville School District	Began: May 19, 2020 Review Schedule Update: May 18, 2021 Closed: April 22, 2022

**2021–2022 School Year**

<b>Subrecipient (LEA)</b>	<b>Method (Desk Review)</b>
Toppenish School District	Began: February 8, 2022 Closed: June 29, 2022 (There is a typo in the Final Approval Letter on the Subject line indicating (CPR) 2019–2020 and it should have stated 2021–2022.)
La Conner School District	Began: March 10, 2022 Closed: July 26, 2022

**2022–2023 School Year**

<b>Subrecipient (LEA)</b>	<b>Method (Desk Review)</b>
Enumclaw School District	Introductory Zoom Meeting: December 13, 2022
White Salmon Valley School District	Introductory Zoom Meeting: December 14, 2022
Clover Park School District	Introductory Zoom Meeting: December 15, 2022

**Part D: Results**

**Copies of any written findings or compliance plans issued. Detailed reports are included.**

The CPR process includes generating correspondence through the Program Monitor Tool. These will be bundled together for each LEA reviewed and include Review Scheduled Letters, Review Schedule Updated Letters, Preliminary Compliance Reports, Follow Up Reports, Revised Reports, Needs Work Letters, Overdue Letters, Closing Out Letters, and Final Approval Completed Letters, as applicable, to clearly demonstrate the effective monitoring process and communication with each LEA.

The CPR process includes the review of the following federal program areas:

- [Civil Rights](#)
- [CTE/Perkins \(Career and Technical Education\)](#)
- [Fiscal Cross-Cutting](#)
- [Foster Care](#)
- [Gun-Free Schools Act](#)
- [Highly Capable](#)
- [Private Schools](#)
- [System and School Improvement](#)
- [Tribal ESEA Consultation](#)
- [Title I, A - Improving Academic Achievement](#)
- [Title I, C - Migrant Education](#)
- [Title I, D - Neglected and Delinquent](#)
- [Title II, A - Teacher and Principal Quality](#)
- [Title III/TBIP \(Transitional Bilingual Instructional Program\)](#)
- [Title IV, A - Student Support and Academic Enrichment](#)
- [Title V, B - Rural Education](#)
- [Title IX - McKinney-Vento \(Students Experiencing Homelessness\)](#)

The *Reviews Scheduled Letters* were initiated by Gayle Pauley, Assistant Superintendent, Special Programs and Federal Accountability; Timothy McNeely, Director of Consolidated Program Review & Rural Education; Sylvia Reyna, CPR Team Lead; and Jason Miller, Executive Director, Elementary Education, Early Learning, Special Programs & Federal Accountability.

The LEAs were reviewed by the MOA Coordinator, specifically the CTE/Perkins checklist, as well as OSPI program reviewers for the remaining federal programs.

#### **MOA CPR Program Monitor Reports for 2018–2019**

The following LEA received an MOA CPR Program Monitor desk review that began during the 2018–2019 school year and was closed out March 30, 2022.

- Lopez Island School District

#### **MOA CPR Program Monitor Reports for 2019–2020**

The following LEAs received an MOA CPR Program Monitor desk review that began during the 2019–2020 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish, unless otherwise noted.

- Central Kitsap School District
- Colville School District
- Mead School District
- North Kitsap School District
- East Valley School District (Spokane) School District
- Medical Lake School District
- Sequim School District
- LaCrosse School District

- Liberty School District
- Odessa School District (Moved to 2020–21)
- Reardan School District
- Lind School District (Moved to 2020–21)
- Ritzville School District (Moved to 2020–21)

### **MOA CPR Program Monitor Reports for 2020–2021**

The following LEAs received an MOA CPR Program Monitor desk review that began during the 2020–2021 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish.

- Odessa School District
- Lind School District
- Ritzville School District

### **MOA CPR Program Monitor Reports for 2021–2022**

The following LEAs received a CPR Program Monitor desk review that began during the 2021–2022 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish.

- Toppenish School District
- La Conner School District

### **MOA CPR Introductory Zoom Meetings for 2022–2023**

The following LEAs received Introductory Meetings via Zoom in December. This demonstrates the current work being done during this timeframe in the Biennial Report submission window.

- Enumclaw School District
- White Salmon Valley School District
- Clover Park School District

*Note: The following LEAs and skills centers received MOA Monitoring Letters of Closure and were included in the Supplemental Response to the U.S. Department of Education Office for Civil Rights dated December 31, 2020. The information is included here, not the letters, to clearly show the work that was done during this timeframe.*

### **Letters of Closure Issued September 25, 2020**

- Centralia School District
- Chehalis School District
- East Valley (Spokane) School District
- Highline School District (Host District) for the Puget Sound Skills Center
- Liberty School District
- Lynden School District
- Mary Walker School District
- Meridian School District

- North Kitsap School District
- North Thurston School District
- Orting School District
- Riverside School District
- Soap Lake School District
- Toppenish School District
- Touchet School District
- Washtucna School District

**Letters of Closure Issued September 28, 2020**

- Bainbridge Island School District
- Bethel School District
- Bethel School District (Host District) for the Pierce County Skills Center
- Cashmere School District
- Edmonds School District
- Enumclaw School District
- Lake Chelan School District
- Lopez Island School District
- Mansfield School District
- Renton School District
- Selah School District
- Skykomish School District
- South Kitsap School District
- Spokane School District
- Stanwood-Camano School District

**Part E: Technical Assistance**

**Description of technical assistance services offered to subrecipients to address gaps in access and success for CTE students in CTE programs.**

**Professional Development Conferences**

**WA-ACTE Summer Conference**

Sessions: MOA Changes and Resources

Monday, August 3, 2020

OSPI Office Hours and Staff available for technical assistance during conference

**WA-ACTE Summer Conference**

Session: Changing the Shape of Consolidated Program Review (CPR) & MOA, Perkins

Monday, August 9, 2021

OSPI Office Hours and Staff available for technical assistance during conference

**WA-ACTE Summer Conference**

Session: MOA, Consolidated Program Review, Perkins

Monday, August 8, 2022

OSPI Office Hours and Staff available for technical assistance during conference

**MOA Civil Rights and Equal Access to CTE Technical Assistance Zoom Meetings**

<b>Date</b>	<b>Time</b>	<b>Person</b>
<b>2020</b>		
Tuesday, September 22	2:00–3:00 PM	Deifi Stolz
Tuesday, October 20	3:00–4:00 PM	Deifi Stolz
Thursday, October 22	3:00–4:00 PM	Deifi Stolz
Tuesday, November 17	3:00–4:00 PM	Deifi Stolz
Tuesday, December 8	11:00 AM–12:00 PM	Deifi Stolz
<b>2021</b>		
Tuesday, January 19	10:00–11:00 AM	Deifi Stolz
Tuesday, February 16	10:00–11:00 AM	Deifi Stolz
Tuesday, March 16	10:00–11:00 AM	Deifi Stolz
Tuesday, April 20	10:00–11:00 AM	Deifi Stolz
Tuesday, May 18	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, June 15	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, September 21	3:00–4:00 PM	Deifi Stolz
Tuesday, October 26	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, November 9	2:00–3:00 PM	Deifi Stolz
Tuesday, December 14	11:00 AM–12:00 PM	Deifi Stolz
<b>2022</b>		
Tuesday, January 11	2:00–3:00 PM	Deifi Stolz
Tuesday, February 8	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, March 8	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, April 12	2:00–3:00 PM	Deifi Stolz
Tuesday, May 10	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, June 14	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, September 19	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, October 11	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, November 8	11:00 AM–12:00 PM	Deifi Stolz
Tuesday, December 13	10:00–11:00 AM	Deifi Stolz

**Resources Available for Technical Assistance**OSPI's CTE website: <https://www.k12.wa.us/student-success/career-technical-education-cte>

- CTE Resources website: <https://www.k12.wa.us/student-success/career-technical-education-cte/cte-resources>
- Methods of Administration (MOA) website: <https://www.k12.wa.us/student-success/career-technical-education-cte/cte-resources/methods-administration-moa-civil-rights-onsite-reviews>

OSPI's Equity and Civil Rights website: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights>

OSPI's Special Education website: <https://www.k12.wa.us/student-success/special-education>

### **Phone Calls & Emails**

Respond to districts, skills centers, and State-Tribal Education Compacts (STECs) who request assistance.

### **Optional: Feedback to Federal Civil Rights Resources.**

The following websites and webinars have been helpful in researching and obtaining information that directly impacts MOA compliance:

U.S. Department of Education Office for Civil Rights Policy Guidance Portal website:

<https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/index.html>

U.S. Department of Education Office for Civil Rights Reading Room website:

<https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/readingroom.html>

U.S. Department of Education Office for Civil Rights Frequently Asked Questions website:

<https://www2.ed.gov/about/offices/list/ocr/faqs.html>

U.S. Department of Education Office for Civil Rights Reports and Resources website:

<https://www2.ed.gov/about/offices/list/ocr/reports-resources.html>

Perkins Collaborative Resource Network (PCRN) MOA website:

<https://cte.ed.gov/legislation/methods-of-administration>

U.S. Department of Education Office for Civil Rights Outreach, Prevention, Education and Non-discrimination (OPEN) Center is aimed at supporting schools, educators, students and families in proactively complying with federal nondiscrimination laws. The Open Center's role is to field questions and to create technical assistance materials, create webinars, training materials and presentations. The OPEN Center attorney's focus is on proactive compliance with federal civil rights laws and offers a dedicated team for education, prevention, and outreach. Inquiries can be sent to: [OPEN@ed.gov](mailto:OPEN@ed.gov)

U.S. Department of Education Office for Civil Rights Short Webinar: How to File an OCR Complaint:

<https://youtu.be/BuwVa3JJE-4>

This webinar describes who can file a discrimination complaint with OCR, the four ways in which one can file a complaint, and the type of information that must be provided in the complaint.

Other Beneficial OCR Webinars:

- [OCR 100: An Introduction to Federal Civil Rights Protections in Education](#)
- [OCR Short Webinar on Updates to Perkins and Methods of Administration Programs](#)
- [OCR Short Webinar on Sexual Violence in Public Schools](#)
- [OCR Short Webinar on Online Education and Website Accessibility](#)
- [Students with Disabilities and the Use of Restraint and Seclusion in K-12 Schools](#)

## Part D: Results



## **MOA CPR Program Monitor Reports 2018–2019**

The following LEA received an MOA CPR Program Monitor desk review that began during the 2018–2019 school year and was closed out March 30, 2022.

- Lopez Island School District

**Review Scheduled**

**From:** gayle.pauley@k12.wa.us  
**To:** bauckland@lopezislandschool.org  
**CC:** [ngartland@lopezislandschool.org](mailto:ngartland@lopezislandschool.org); [dsather@lopezislandschool.org](mailto:dsather@lopezislandschool.org);  
[icolmanwester@lopezislandschool.org](mailto:icolmanwester@lopezislandschool.org); [msteinbrueck@lopezislandschool.org](mailto:msteinbrueck@lopezislandschool.org);  
[gayle.pauley@k12.wa.us](mailto:gayle.pauley@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us)  
**Subject:** Consolidated Program Review (CPR) 2018-2019 Review Scheduled - Lopez School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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10/30/2018

TO: Brian Auckland, Superintendent  
Lopez School District

FROM: Gayle Pauley, Assistant Superintendent  
Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2018-2019 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2018-19 school year.

**The date for your On-site, Full, review is 3/27/2019. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks from the start date of your review.**

A team of program supervisors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, three state programs (LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights

requirements. Please note the fiscal portion of our checklist covers the prior year (2017-18), while the rest of the review covers current year (2018-19) unless otherwise noted.

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **On-Site Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 10/30/2018. OSPI team members will begin to review your documentation prior to coming on-site. During that time, individual OSPI program supervisors *may* contact your LEA for clarification or further documentation. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

On the day of your review we will begin in the morning at 8:30 a.m. with a brief interactive dialogue between OSPI staff and key LEA program staff for approximately one (1) hour. For the morning meeting your LEA should include those individuals who oversee federal and state programs. The focus of this meeting is to talk about your LEA's goals and the use of your supplemental state and federal programs to meet those goals. *Throughout the review, it is important that LEA program staff be available to meet with OSPI staff regarding their programs.*

OSPI staff will then visit selected public and private schools (if applicable) to review individual programs. Monitors on-site will also connect with counterpart staff within your district to discuss program compliance requirements and provide technical assistance. Listed below are the public schools the team expects to visit. However, any school within your LEA is subject to possible review.

CVA-Lopez Island  
Lopez Elementary School  
Lopez Middle High School

An exit interview will take place at approximately 4:00 p.m. on the 3/27/2019 to present observations and review any noncompliant items.

#### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit interview to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2018-19 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

#### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2018. The current version may be found at <http://www.k12.wa.us/ConsolidatedReview/>.

#### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2018-19) focuses on LEAs within Educational Service Districts (ESDs) 123 and 189. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

#### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the OSPI website: <http://www.k12.wa.us/ConsolidatedReview/>.

Thank you.

cc:

Nina Gartland, Civil Rights Contact, Lopez School District

David Sather, CPR Contact, Lopez School District

Joanne Colman Wester, CPR Contact, Lopez School District

Marina Steinbrueck, Civil Rights Contact, Lopez School District

**Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us

**To:** bauckland@lopezislandschool.org

**CC:** [dsather@lopezislandschool.org](mailto:dsather@lopezislandschool.org); [msteinbrueck@lopezislandschool.org](mailto:msteinbrueck@lopezislandschool.org); [janetteb@ncesd.org](mailto:janetteb@ncesd.org); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us); [barbara.dittrich@k12.wa.us](mailto:barbara.dittrich@k12.wa.us); [Debbie.Crawford@k12.wa.us](mailto:Debbie.Crawford@k12.wa.us); [Gayle.pauley@k12.wa.us](mailto:Gayle.pauley@k12.wa.us); [jody.hess@k12.wa.us](mailto:jody.hess@k12.wa.us); [pat.smithson@k12.wa.us](mailto:pat.smithson@k12.wa.us); [Jeannie.Beierle@k12.wa.us](mailto:Jeannie.Beierle@k12.wa.us); [sarah.albertson@k12.wa.us](mailto:sarah.albertson@k12.wa.us); [kasha.roseta@k12.wa.us](mailto:kasha.roseta@k12.wa.us); [Mona.Johnson@k12.wa.us](mailto:Mona.Johnson@k12.wa.us); [Dierk.Meierbachtol@k12.wa.us](mailto:Dierk.Meierbachtol@k12.wa.us); [Michaela.Miller@k12.wa.us](mailto:Michaela.Miller@k12.wa.us); [Rebecca.Wallace@k12.wa.us](mailto:Rebecca.Wallace@k12.wa.us); [isaac.conver@k12.wa.us](mailto:isaac.conver@k12.wa.us)

**Subject:** Consolidated Program Review (CPR) 2018-2019 Follow-up Report - Lopez School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/27/2019

TO: Brian Auckland, Superintendent  
Lopez School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2018-2019 Report

On 3/27/2019–3/27/2019, a team from the Office of Superintendent of Public Instruction (OSPI) conducted a review of federal and state programs in which your district participates.

This report includes technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 5/13/2019.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	Item 6.3: District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.
10. Homeless	<p><i>Item 10.5: Housing Questionnaire</i> The LEA should consider providing the Housing Questionnaire to all students/families at multiple times during the year as student housing can change frequently. The LEA could consider providing this form after the winter holidays and again in the spring during conferences.</p> <p><i>Item 10.6: Enrollment, Intake, and Access</i> Students experiencing homelessness are categorically eligible for free school meals. These students do not need to complete a Free and Reduced Lunch form.</p> <p><i>Item 10.11: Title I Set-Aside</i></p> <p>Needs Assessment: When completing the needs assessment, the LEA should determine all needs of students experiencing homelessness. Once determined, the LEA needs to consider all community resources, whether specific to students experiencing homelessness or not, that are utilized to meet this specific need. Then, the LEA will determine which needs are met through other LEA fund sources such as transportation, Invest ED, REAP, etc. Once completed, those needs not met by other sources would fall under the Title I Set-Aside. The Set-Aside is the last source of funds that should be utilized in the event that all other sources have been exhausted.</p> <p><i>The following suggestions may help with identification and provision of services:</i></p> <p>1. Ensure that all LEA staff understand the definition of unaccompanied children and youth. There is no age limit for unaccompanied children and youth. As long as a student is eligible for K-12 they are eligible as an unaccompanied child or youth and MV. Any student who is not in the physical custody of a parent or legal (court appointed) guardian would be considered an unaccompanied youth and most of these students</p>

	<p>would be eligible for MV services as these situations are often temporary and those they reside with have no legal requirement to care for them.</p> <p>2. Adults who are caring for unaccompanied youth are considered “parent” under FERPA. Should these individuals wish to be involved in the student’s education, and the student agrees to this, they are able to access educational resources, be involved in educational decisions, excuse absences, sign permission slips, etc. Unaccompanied child/youth’s wishes must be given priority in terms of educational decisions based on McKinney-Vento. Should the Unaccompanied child or youth not have an interested individual to act as “parent” the LEA can appoint an advocate to assist them in educational decisions, the excusing of absences, etc. This person may be the liaison or another staff member who has a connection or good working relationship with the student.</p> <p>3. Ensure that unaccompanied youth are noted in Skyward as both homeless and unaccompanied. These students must be flagged in the "homeless" section of Skyward AND in the separate section for unaccompanied youth. This section can be found under "Other WA Prog" and is category 24.</p> <p>4. Ensure that doubled up students are identified based on the definition of homelessness under McKinney-Vento. Even if a family is living doubled up due to perceived cultural reasons, if they are residing in this manner due to lack economic ability to afford housing, lack of available housing, or similar reason they would be eligible. Additionally, if the housing is overcrowded or inadequate, they would be eligible for services.</p> <p>5. Ensure that all students are identified under the law even if they refuse services. Families/students do have the right to refuse services, but the LEA is federally required to identify all students experiencing homelessness. In the event that a student/parent/guardian refuses all services, the LEA must still identify them in Skyward, but should indicate that all services have been refused.</p>
<p>11. Highly Capable</p>	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Please email Jody Hess for access to OSPI’s <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules.</p>
<p>14. Civil Rights</p>	<p><i>14.1: Compliance Coordinators</i></p> <p>The District’s Section 504 coordinator and civil rights coordinator should seek additional training. If in-person trainings are not available, this may include self-training by viewing webinars and studying civil rights guidance. Webinars and guidance on Section 504, Title IX, and other civil rights topics is available at <a href="http://www.k12.wa.us/Equity/default.aspx">http://www.k12.wa.us/Equity/default.aspx</a></p>



#### *14.3: Sexual Harassment Policy and Procedure for Students and Employees*

We recommend updating the bracketed text found in model WSSDA policies and procedures. (Example: "Complaints may be submitted by mail, fax, e-mail or hand-delivery to the district Title IX Coordinator, [ insert name/title] at [ insert office address, telephone number and e-mail address].")

#### *14.4: Section 504*

The district must ensure that placement decisions for students eligible for accommodations, aids, and services under Section 504 are made by a group of people (the 504 team), including people knowledgeable about the child, the meaning of the evaluation data, and the placement options.

In making Section 504 FAPE determinations, the Section 504 team cannot limit its placement recommendations to those related aids or services that are free or low-cost, and cannot exclude them just because of their expense (although, of course, if there are equally effective related aids and services, nothing in Section 504 precludes a school district from choosing the less costly alternative). It is helpful if that group includes a school district representative who can ensure the district provides, or is able to provide, all services that are identified as necessary. The absence of such a representative on the Section 504 team could result in a denial of FAPE if the Section 504 team determines certain services are necessary and the district is unable or unwilling to provide them.

#### *14.5: Interpretation and Translation*

The district is strongly encouraged to develop a formalized process to ensure language assistance services are consistently and effectively used to communicate with parents in a language they understand.

WSSDA's model language access policy and procedure, 4218/4218P, may be a helpful place to start. The district's ESD may also have interpreter training or other resources available.

Further, the district should ensure building staff are knowledgeable and trained on the language assistance services available to them, including the phone interpreter service.

#### *Identifying a need for interpretation or translation support*

OSPI has free posters available for districts to publicize the availability of interpretation and translation services: <http://www.k12.wa.us/Equity/pubdocs/Multi-LanguageWelcomePoster.pdf>.

#### *Qualified Interpretation and Translation Resources*

Washington state does not currently have a universal certification process for school translators or interpreters. Bilingualism, or the ability to communicate directly with LEP parents in a language other than English, does not solely qualify a person to serve as an interpreter or translator.

Whether a school uses a bilingual employee or an outside contractor to interpret or translate, the school must ensure the individual is trained on the role and ethics of interpreting or translating, and the need to maintain confidentiality.

For resources, service providers, and sample translated documents:

<http://www.k12.wa.us/Equity/Interpretation.aspx>.

#### *Bring Your Own Interpreter?*

Providing language assistance services to LEP parents is the district's responsibility, and it should not rely on parents to bring interpreters to meetings. If a parent insists on using an adult friend or family member as an interpreter, the district should consider whether this interpreter is qualified and competent. If not, the district should consider whether it also needs a district-approved interpreter.

#### *Translation Apps*

Using apps such as Google Translate are acceptable only if the translated document accurately conveys the meaning of the source document, including accurate translations of technical vocabulary. The only way to confirm that is to have the translation reviewed and edited by a qualified translator.

14:7: Note: OSPI provides translated versions of several forms, such as the "Home Language Survey" and "Ethnicity and Race Data Collection Form."

#### *About birth certificates and establishing student age for enrollment purposes*

Requesting documentation of student age must not be done in a way that discourages a prospective student from enrolling and attending school based on lack of particular paperwork, or immigration or citizenship status.

The following are examples of documents, in addition to birth certificates, that could be used to establish age: a religious, hospital, or physician's certificate showing date of birth; an entry in a family bible; an adoption record; an affidavit from a parent; previously verified school records; etc.

#### *14.8: Identifying and responding to potential disparities*

A straightforward way to demonstrate implementation of a compliant annual review process is to show it in action—to show that the disaggregated data from each school has actually been explored (such as summaries and analysis, or relevant meeting minutes), leading to testable hypotheses explaining why any identified disproportionalities exist. More guidance about this data analysis is included within OSPI's sample worksheets, is available at:

<http://www.k12.wa.us/Equity/Districts/ConsolidatedProgramReview.aspx#14.8>

#### *14.9: Student Discipline*

Even districts with small N sizes may be able to use year-over-year data to spot trends in discipline data that suggest some student groups are disciplined more or less than other

	<p>student groups. While a smaller district's small N size may make it difficult to gather enough data to make conclusive determinations, the analysis may still help a school identify potential ways to help specific students. A district reviewing a possible disproportionality between exclusion of homeless and non-homeless students, for example, might work around a small N size by looking for year-over-year trends. Even if that still does not generate clear answers regarding a potential disproportionality, the analysis may identify opportunities to engage with one or two students in crisis.</p>
15. Fiscal	<p><i>Procurement</i></p> <p>The District has updated Policy 6220 with the new procurement thresholds, however, federal thresholds for purchase of Goods (including textbooks) needs editing. The District must use the more restrictive \$75,000 state threshold instead of the \$150,000 threshold identified in their policy. We have uploaded OSPI's Bulletin B081-18 under 15.2 for reference.</p> <p><i>Payroll</i></p> <p>Employees and supervisors should certify their time semi-annually after the certification period has ended.</p>

**Action Plan(s) Approved**

Program	Number	Description
Title III / TBIP	7.6	Implementation of Title III Plan

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part A	1.12	Title I, Part A Set-Asides	A. Please provide an expenditure report or off the books tracking that shows the homeless set-aside was budgeted/reserved, even if those funds were not expended.
Title I, Part A	1.15	Supplement, Not Supplant	Please provide additional details about how state and local funds are distributed to buildings. Additional details for the methodology such as: How are the "considerations" considered? What does "fluctuations in funding allocations" mean in the methodology? Are funds distributed based on FTE PPE, etc.?

			<p>The example of an employee schedule is not sufficient to demonstrate that the methodology is being followed.</p> <p>See the guidance and examples here:</p> <p><a href="http://www.k12.wa.us/TitleI/ProgramFunds.aspx#Fiscal">http://www.k12.wa.us/TitleI/ProgramFunds.aspx#Fiscal</a></p>
Title II, Part A	6.1	Teacher Professional Qualifications	Please provide evidence of school board approval for the Out-of-Endorsement teachers on the list which was uploaded on 3/22/2019 as 6.1.A
Homeless	10.5	Identification of Students	<p>C&amp;D.</p> <p>Please provide evidence that elementary staff have been provided training on the rights and identification of students experiencing homelessness.</p> <p>Please provide sign-in sheets from elementary staff and materials utilized during the training.</p>
Highly Capable	11.2	Identification Process & Consent	Highly Capable policy is in "draft" status. Please bring to board for approval and upload final policy.
Civil Rights	14.5	Interpretation and Translation Services	<p>B: Please submit a description of the district's process for ensuring interpretation and translation services are provided to communicate vital information with LEP parents, along with a plan for the implementation of that new process.</p> <p>The description should include, at minimum:</p> <ol style="list-style-type: none"> <li>1. How the district determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the district determines which language(s) to translate documents into.</li> <li>4. How the district ensures its employees are informed about to how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p>C: Please submit a description of the process the district uses to</p>

			<p>ensure that its interpreters and translators, including district or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents.</p>
Civil Rights	14.8	Course and Program Enrollment	<p>A: The submitted description does not provide sufficient information about the district’s annual review process to identify and address potential disparities. Please submit a narrative that describes the district's process for annually reviewing course and program enrollment data at each school, disaggregated by sex, race, EL status, and disability (including special education and Section 504). At a minimum, please identify when the review of course and program enrollment data takes place, who participates, which courses and programs are reviewed, what data is considered, how the data is analyzed to determine whether disparities exist, and how the reviewing team determines what next steps to take in response to its analysis. If the district uses a different process at one or more schools, please clarify that as well.</p> <p>B: Please provide evidence that demonstrates that the district carried out the review process described in Item 14.8.A. It is not sufficient for a school or district to submit raw, aggregated, and disaggregated data without analysis. It is also not sufficient to only analyze data relating to sex, without race, EL status, and disability (including special education and Section 504).</p> <p>C: If a district has identified potential disparities in its review of course and program enrollment data, then the district responds to Item 14.8.C by describing the district’s plan to address those disparities and submits evidence that the district is implementing the plan. (This could include, for example, evidence of a root cause analysis or a guided review of existing policies and practices, such as those noted in WAC 392-190-010). The district’s response to Item 14.8.C is not clear.</p> <p>Please describe, for each potential disparity identified through the review process, the district’s plan to resolve the disproportionality. (For example, if the district has identified a certain student group is underrepresented in a course or program, the description should address how the district has analyzed possible root causes of this underrepresentation and</p>

			developed and implemented plans that target those root causes.)
Civil Rights	14.9	Student Discipline	<p>A: Please submit a narrative that describes the district’s process for annually reviewing disaggregated discipline data from each school to identify any disproportionalities based on sex, race, EL status, and disability (special education and Section 504).</p> <p>Please describe, at minimum:</p> <ol style="list-style-type: none"> <li>(1) Who is included in the review of each school’s data;</li> <li>(2) What types of corrective and disciplinary actions are included in the data reviewed by each school team (e.g.- suspensions, in-school suspensions, referrals to the office, etc.);</li> <li>(3) What, if any, comparative data is reviewed by school teams, such as multiple semesters/years of data to identify trends;</li> <li>(4) How the school teams analyze their disaggregated data to determine whether disproportionalities exist; and</li> <li>(5) What steps they take to correct any identified disproportionalities, and to determine whether disproportionalities are the result of discrimination.</li> </ol> <p>B: Please submit evidence of implementation of the process described in response to Item 14.9.A. Evidence should show how the district analyzed the disaggregated data at each school to determine whether disproportionalities exist, including summaries of the data reviewed and analysis of whether disproportionalities exist and their root causes.</p> <p>C: If the district has identified any disproportionalities as part of its review process, please explain, with supporting evidence, the causes of each disproportionality (a “root cause analysis”), what actions the district is taking in response, and how the district determined that each school’s action plan appropriately addresses each disproportionality and ensures it is not the result of discrimination.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities	<p>C: Please submit the completed athletic opportunities Excel worksheet. For reference, see the blank worksheet and instructions:  <a href="http://www.k12.wa.us/Equity/pubdocs/AthleticOpportunitiesToOl.xlsx">http://www.k12.wa.us/Equity/pubdocs/AthleticOpportunitiesToOl.xlsx</a></p>

Foster Care	17.2	Collaboration with the local Child Welfare Agency	<p>A) Submit your signed Interagency Agreement with Children's Administration as evidence.</p> <p>B) Provide evidence of regular on-going communication between district staff and staff at Children's Administration.</p>
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title I, Part A	1.8	Schoolwide Program	Please submit an action plan for SW Plan revision in the spring at the spring review meeting.
Title III / TBIP	7.3	Title III-Eligible Native American Students	<p>Submit updated procedures for identifying Title III eligible Native American students, consistent with <a href="http://www.k12.wa.us/MigrantBilingual/pubdocs/TBIPGuidelinesNativeAmerican.pdf">http://www.k12.wa.us/MigrantBilingual/pubdocs/TBIPGuidelinesNativeAmerican.pdf</a>.</p> <p>Provide a list of Native American students in Lopez with a determination of whether the students are academically at risk.</p> <p>Provide a template of the letter the district will send prior to testing potentially eligible Native American students (<a href="http://www.k12.wa.us/MigrantBilingual/pubdocs/TitleIIINativeParentPlacementTestNotificationLetter.docx">http://www.k12.wa.us/MigrantBilingual/pubdocs/TitleIIINativeParentPlacementTestNotificationLetter.docx</a>).</p> <p>Submit an action plan for implementing the procedures annually, including a timeline for screening potentially eligible students this spring.</p>
Title III / TBIP	7.5	English Language Development Services	<p>Submit an action plan for ensuring that all eligible English learners, including those at a high progressing level, receive English language development instruction delivered/designed by qualified staff that is appropriate for their language proficiency level. Services must support the language domains of Speaking, Listening, Reading, and Writing.</p> <p>Program services for each student must be designed and reasonably calculated to enable students to attain English proficiency within a reasonable length of time.</p>

Homeless	10.1	LEA Policy	<p>The policy in evidence is neither the WSSDA May 2018 stock policy nor its equivalent.</p> <p>The LEA is required to adopt a comprehensive policy related to serving the educational needs of homeless children and youth in accordance with the McKinney-Vento Act.</p> <p>The district will need to revise their policy to meet compliance with the WSSDA May 2018 policy. They can either adopt the stock policy, or create its equivalent.</p> <p>Please upload a copy of the revised policy.</p> <p>Please provide an action plan for the adoption of the revised policy. (To be completed before the end of the 2018-19 school year.</p>
Homeless	10.4	LEA Liaison	<p>B. Please provide further clarification that the liaison's FTE is sufficient.</p> <p>Evidence suggests that the liaison's 1 FTE is broken into teaching and counselor, which does not provide a dedicated FTE to perform the federally required job duties of the LEA liaison.</p> <p>If the evidence provided does not accurately reflect the liaison's FTE, please provide further documentation such as an updated Statement of Attestation.</p>
Homeless	10.10	Posting of Rights and Parent Information	<p>C. The LEA must create or adopt a community resource directory for students and families.</p> <p>This list should contain housing, health care, food bank, social services information, etc. This list may contain information for services based on other islands or in Anacortes due to the geographic location of the LEA.</p>
Homeless	10.11	Title I Set-Aside	<p>Please provide a detailed action plan for the creation of the 2019-20 Title I Homeless Set-aside needs assessment.</p> <p>The liaison must be involved in this process.</p> <p>In the action plan, please outline the intended process to determine need of students and the sources within the community and LEA utilizes to meet need.</p>



			Please see Technical Assistance for further information.
Highly Capable	11.1	Annual Public Announcement of ID Activity	Please revise procedures to eliminate use of and reference to "cut scores" on standardized assessments. Use of "cut scores" does not consider Standard Error of Measure present in all standardized assessments. The selection committee is to review all available relevant data for each student to determine whether preponderance of evidence indicates need for services.
Perkins /CTE	12.1	Assurances	12.1.A: LEA to provide signed and dated 2018-19 Perkins Assurances.  12.1.B: LEA to provide approved Perkins Local Plan from School Board meeting minutes.
Perkins /CTE	12.2	Frameworks	12.2.B: LEA to upload frameworks with appropriate signature page. Provide signed and dated Signature Page.
Perkins /CTE	12.3	Community and Educational Partnerships	12.3.A: LEA to submit membership roster list that reflects representatives from the program specific business, industry, and community agencies. (List must include the program specific committee title, member names, specific industry/business they are representing, and/or community agency they represent).  12.3.B: LEA to submit copy of approved minutes from previous meeting.
Perkins /CTE	12.5	Professional Development/CTE Personnel	12.5.A: LEA to provide a list of all CTE teachers, teacher assignments, dates of PD, and conference/ workshop titles.  LEA submitted a spread sheet of dates, course descriptions, credits, and institution. It does not identify on the form the CTE teachers name or assignment(s).  12.5.B: LEA to submit signed and dated 2018-19 Professional Growth Plan for Certificate Renewal for Amy Studzienko.
Perkins /CTE	12.6	Leadership and Employability	12.6.A: LEA verification of student leadership opportunities by program area through Equivalents.  12.6.B: LEA to submit a Program of Work for CTSO-equivalent leadership (aligned with the content standards of the courses).

Perkins /CTE	12.7	Links to Post-Secondary Opportunities	<p>12.7.A: LEA to submit signed and dated Program of Study Assurance Checklist by LISD and SVC.</p> <p>12.7.B: LEA to submit completed Program of Study template aligned with the Perkins 5-Year Application Plan. LEA provided the Perkins 5-Year Plan.</p> <p>12.7.C: LEA to submit evidence the courses within the identified Program of Study (career cluster and pathways) have been approved by OSPI.</p>
Perkins /CTE	12.8	Extended Learning Opportunities	<p>12.8.A: LEA to provide documentation the learning is extended into the community reflected in the program of work. Student recognition, employability and career skills, planning and evaluation, competitive events, community service, public relations and advocacy, organization and management, finance, and fundraising.</p> <p>12.8.B: LEA to provide documentation that time is allowed for staff coordination of extended learning. Evidence of frameworks, teachers sign in sheet with date(s).</p>
Perkins /CTE	12.9	Program Evaluation	<p>12.9.A: LEA to provide program specific evaluations.</p> <p>12.9.B: LEA to provide signed and dated CTE Five-Year Districtwide Plan approved by School Board.</p> <p>12.9.C: LEA to submit PPIP on 1S1, 1S2, 6S1.</p>
Civil Rights	14.2	Nondiscrimination Statement	<p>A-F: The submitted documents and district employment webpage do not demonstrate use of a consistent and compliant nondiscrimination statement. Not all provided examples list the current civil rights, Title IX, and/or Section 504 coordinators, or identifies a coordinator by without listing their name and/or job title (Example: Not “Title IX Coordinator” unless that is the person's job title.)</p> <p>Please submit:</p> <p>1- Evidence that the district’s website and all current job applications and announcements use nondiscrimination statement as it is currently posted on the district’s website (as provided in response to Item 14.2.A); and</p> <p>2- A proposed action plan describing how the district will ensure that the revised nondiscrimination statement is included in all major district</p>

			<p>and school publications that are widely disseminated to students, parents, or employees.</p> <p>As part of the plan, please specifically identify publications that will be updated (including web pages, newsletters, handbooks, CTE publications, online, and ALE publications, job applications and announcements, etc.), when each will be updated, and who will be responsible for each update.</p> <p>To check a sample nondiscrimination statement or check a list of necessary components:  <a href="http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx">http://www.k12.wa.us/Equity/Districts/NondiscriminationStatement.aspx</a></p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>B: Please submit the district's nondiscrimination procedure for employees (WSSDA's 5010P or equivalent), along with an anticipated board adoption date (if necessary/applicable).</p> <p>E &amp; F: The submitted student and employee handbooks do not include adequate information about the district's discrimination complaint procedures and contact information. The employee handbook also includes a different/draft version of Policy 5010, and includes Policy 6590, which appears to be a previous and no longer applicable policy.</p> <p>Please submit:</p> <p>(1) Draft language that will be included in the district's student and employee handbooks by the beginning of the 2019-20 school year (sample handbook language is available at <a href="http://www.k12.wa.us/Equity/Districts/ConsolidatedProgramReview.aspx#14.3">http://www.k12.wa.us/Equity/Districts/ConsolidatedProgramReview.aspx#14.3</a>).</p> <p>(2) A proposed action plan that describes: (a) when the student and employee handbooks (for each building) will be revised and provided to students and parents; (b) how the district will provide this notice to students, families, and employees in the current school year (e.g., newsletter or notice that is sent home with each student, email sent to employees, etc.); (c) the date by which this will be completed, and (d) who will be responsible for completing this action plan.</p> <p>G: Please submit evidence that the district has update its Sexual Harassment Posters to include contact information for the Title IX compliance coordinator, that it is has done so in every school building,</p>

			<p>and that it is located where it is visible to both students and staff. (Note: The district is also welcome to order free copies of OSPI's Sexual Harassment Poster, translated into multiple languages.).</p> <p>H: Please clarify whether the district's training includes information regarding Washington's civil rights laws and the district's discrimination complaint procedure. If not, please submit a proposed action plan for training all administrators and certificated and classroom personnel regarding civil rights compliance.</p> <p>This training must include, at minimum, information about Washington's protected classes, forms of discrimination, recognizing different forms of discrimination, how employees must respond to allegations of discrimination, and the district's discrimination complaint procedures (3210P and 5010P).</p> <p>The action plan should describe (a) the date the training(s) will occur (no later than the end of the school year); (b) how the district will ensure all administrators and certificated and classroom personnel receive the training (e.g., sign-in sheets, follow-up with employees who miss the training); (c) an outline of what will be included in the training; and (d) which employee will be responsible to provide the training and carry out this action plan.</p> <p>OSPI has sample training materials available at:  <a href="http://www.k12.wa.us/Equity/Districts/ConsolidatedProgramReview.aspx#14.3">http://www.k12.wa.us/Equity/Districts/ConsolidatedProgramReview.aspx#14.3</a></p>
Civil Rights	14.1 1	Annual Athletic Evaluation	<p>A: Please provide evidence that the district annually evaluates the girls' and boys' athletic programs at each school, considering each of the required factors. Evidence can include dated and completed team, building, and district worksheets.</p> <p>B: If any disparities are identified by the process described above, please provide a description of the district's plan to address each disparity and evidence of implementation. (District has not yet reviewed the results of its 2018-2019 annual athletic evaluation.)</p> <p>C: Please submit a narrative description of how the district ensures athletic fundraising, donations, and booster club activities do not result in disparities that favor one sex over another. The description could include a booster club and fundraising policy with explicit consideration of sex equity, the district's process to balance funding between girls'</p>

			<p>and boys' programs, etc.</p> <p>For more guidance, read the "Booster Clubs and Donations" section at: <a href="http://www.k12.wa.us/Equity/Athletics.aspx">http://www.k12.wa.us/Equity/Athletics.aspx</a></p>
Fiscal	15.1	Grant Claims and Expenditures	<p>The Title I application for the 2017/2018 year was not submitted until 12/1/17. Therefore, costs should not have been incurred for the 2017/2018 grant until 12/1/17. The district would have been eligible to spend their 2016/2017 carryover funds totaling \$10,000 from the prior year, however the expenditures exceeding the carryover amount prior to 12/1 were outside of the period of performance. There is approximately \$8,693 that was spent outside of the period of performance for the Title I grant.</p> <p>Please provide an action plan detailing how the district will ensure funds are not spent outside of the period of performance moving forward.</p>
Fiscal	15.2	Accounts Payable Charges	<p>During review of the transaction for Renaissance Learning totaling \$4,072.13, there was no justification completed at the time of the purchase to document the reasoning for using the vendor as sole source.</p> <p>Please provide an action plan detailing how the District will ensure procurement methods will be followed moving forward.</p>

cc:

David Sather, CPR Contact, Lopez School District

Marina Steinbrueck, Civil Rights Contact, Lopez School District

Janette Bumgarner, Fiscal Contact, Lopez School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**From:** timothy.mcneely@k12.wa.us  
**To:** bauckland@lopezislandschool.org;  
**CC:** dsather@lopezislandschool.org; msteinbrueck@lopezislandschool.org;  
nicolec@ncesd.org;  
**Subject:** CPR 2018-19 Follow-up Overdue  
**Attachments:** No attachments found for this message.

July 3, 2019

Good afternoon, Brian.

Thanks to your team for continued efforts working to respond to CPR Follow-up.

*At present, your LEA's response to OSPI is overdue.*

We are still looking for documentation for the following items:

10.1  
10.11  
11.1  
12.3  
12.6  
12.7  
12.8  
14.2  
14.3  
14.8  
14.9  
14.10  
14.11

When those items are responded to, your LEA will be able to submit follow-up back to OSPI, and we can continue to work toward compliance and closing out this review.

Please provide follow-up documentation as absolutely soon as possible, and let us know if we can provide any support to you completing follow-up on these items.

Thanks,  
Timothy

--

Timothy McNeely

Pronouns: he, him, his

Director, Consolidated Program Review (CPR) & Rural Education

Special Programs & Federal Accountability

Office of Superintendent of Public Instruction (OSPI)

P.O. Box 47200 | Olympia, WA 98504-7200

office: 360-725-6234

[timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)

[www.k12.wa.us](http://www.k12.wa.us)

*All students prepared for post-secondary pathways, careers, and civic engagement.*

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** bauckland@lopezislandschool.org  
**CC:** [dsather@lopezislandschool.org](mailto:dsather@lopezislandschool.org); [msteinbrueck@lopezislandschool.org](mailto:msteinbrueck@lopezislandschool.org); [nicolec@ncesd.org](mailto:nicolec@ncesd.org); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** 2018-19 Lopez School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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12/16/2019

TO: Brian Auckland, Superintendent  
Lopez School District

FROM: Timothy McNeely, Team Lead

RE: 2018-19 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>. *While Lopez School District did not submit follow-up in the most recent round, OSPI has updated determinations to reflect work that was accomplished during that period.*

**Your follow-up due date is January 6, 2020.**



**Evidence Needed**

Program	Number	Description	Evidence
Foster Care	17.2	Collaboration with the local Child Welfare Agency	<p>A) Submit your signed Interagency Agreement with Children's Administration as evidence.</p> <p>B) Provide evidence of regular on-going communication between district staff and staff at Children's Administration.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III / TBI P	7.3	Title III-Eligible Native American Students	<p>Submit updated procedures for identifying Title III eligible Native American students, consistent with <a href="http://www.k12.wa.us/MigrantBilingual/pubdocs/TBIPGuidelinesNativeAmerican.pdf">http://www.k12.wa.us/MigrantBilingual/pubdocs/TBIPGuidelinesNativeAmerican.pdf</a>.</p> <p>Provide a list of Native American students in Lopez with a determination of whether the students are academically at risk.</p> <p>Provide a template of the letter the district will send prior to testing potentially eligible Native American students (<a href="http://www.k12.wa.us/MigrantBilingual/pubdocs/TitleIIINativeParentPlacementTestNotificationLetter.docx">http://www.k12.wa.us/MigrantBilingual/pubdocs/TitleIIINativeParentPlacementTestNotificationLetter.docx</a>).</p> <p>Submit an action plan for implementing the procedures annually, including a timeline for screening potentially eligible students this spring.</p>
Title III / TBI P	7.5	English Language Development Services	<p>Submit an action plan for ensuring that all eligible English learners, including those at a high progressing level, receive English language development instruction delivered/designed by qualified staff that is appropriate for their language proficiency level. Services must support the language domains of Speaking, Listening, Reading, and Writing.</p> <p>Program services for each student must be designed and reasonably calculated</p>

			to enable students to attain English proficiency within a reasonable length of time.
Perkins / CTE	12.1	Assurances	12.1.B: LEA to provide approved Perkins Local Plan from School Board meeting minutes.
Perkins / CTE	12.3	Community and Educational Partnerships	12.3.A: LEA to submit membership roster list that reflects representatives from the program specific business, industry, and community agencies. (List must include the program specific committee title, member names, specific industry/business they are representing, and/or community agency they represent).  12.3.B: LEA to submit copy of approved minutes from previous meeting.
Perkins / CTE	12.6	Leadership and Employability	12.6.A: LEA verification of student leadership opportunities by program area through Equivalent.  12.6.B: LEA to submit a Program of Work for CTSO-equivalent leadership (aligned with the content standards of the courses).
Perkins / CTE	12.7	Links to Post-Secondary Opportunities	12.7.A: LEA to submit signed and dated Program of Study Assurance Checklist by LISD and SVC.  12.7.B: LEA to submit completed Program of Study template aligned with the Perkins 5-Year Application Plan. LEA provided the Perkins 5-Year Plan.  12.7.C: LEA to submit evidence the courses within the identified Program of Study (career cluster and pathways) have been approved by OSPI.
Perkins / CTE	12.8	Extended Learning Opportunities	12.8.A: LEA to provide documentation the learning is extended into the community reflected in the program of work. Student recognition, employability and career skills, planning and evaluation, competitive events, community service, public relations and advocacy, organization and management, finance and fundraising.  12.8.B: LEA to provide documentation that time is allowed for staff coordination of extended learning. Evidence of frameworks, teachers sign in sheet with date(s).

Perkins / CTE	12.9	Program Evaluation	<p>12.9.A: LEA to provide program specific evaluations.</p> <p>12.9.B: LEA to provide signed and dated CTE Five-Year Districtwide Plan approved by School Board.</p> <p>12.9.C: LEA to submit PPIP on 1S1, 1S2, 6S1.</p>
Civil Rights	14.2	Nondiscrimination Statement	<p><b>14.2.A-F:</b> The district’s current online nondiscrimination statement (Item 14.2.A), demonstrated both as an uploaded screenshot and as currently listed in several versions on the district’s website, do not demonstrate use of a consistent and compliant nondiscrimination statement. They do not list all three of the district’s civil rights, Title IX, and Section 504 compliance coordinators.</p> <p>The documents uploaded as examples of compliant newsletters, handbooks, job postings, CTE publications, and ALE publications also do not demonstrate use of a consistent and compliant nondiscrimination statement.</p> <p>Please submit:</p> <ol style="list-style-type: none"> <li>1. Evidence that the district’s website and all current job applications and announcements have been revised to use a nondiscrimination statement that includes all of the necessary components demonstrated in OSPI’s sample nondiscrimination statement and listed in the accompanying checklist of necessary components: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/nondiscrimination-statement-districts">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/nondiscrimination-statement-districts</a>; and</li> <li>2. A proposed action plan describing how the district will ensure that the revised nondiscrimination statement will be included in all major district and school publications that are widely disseminated to students, parents, or employees.</li> </ol> <p>As part of the plan, please specifically identify publications that the district will be updating, including any building or school publications that are disseminated on an annual or periodic basis to all students, parents, participants, applicants, employees, or stakeholders (<i>including web pages, calendars, course catalogs, newsletters, handbooks, CTE publications, student or employment recruitment materials, online, and ALE publications, job applications</i></p>

			and announcements, etc.), when each publication will be updated, and who will be responsible for each update.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p><b>14.3.E &amp; F:</b> The submitted student and employee handbooks do not include adequate information about the district's discrimination complaint procedures and contact information. The employee handbook also includes a different/draft version of Policy 5010, and includes Policy 6590, which appears to be a previous and no longer applicable policy.</p> <p>Please submit:</p> <ol style="list-style-type: none"> <li>1. Draft language that will be included in the district's student and employee handbooks by the beginning of the next school year (sample handbook language is available at <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/samplecombinedhandbooklanguage_discriminationsexualharassment.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/samplecombinedhandbooklanguage_discriminationsexualharassment.docx</a>); and</li> <li>2. A proposed action plan that describes: (a) when the student and employee handbooks (for each building) will be revised and provided to students and parents; (b) how the district will provide this notice to students, families, and employees in the current school year (e.g., newsletter or notice that is sent home with each student, email sent to employees, etc.); (c) the date by which this will be completed, and (d) who will be responsible for completing this action plan.</li> </ol> <p><b>14.3.G:</b> Please submit evidence that the district has updated its Sexual Harassment Posters to include contact information for the Title IX compliance coordinator, that it has done so in every school building, and that it is located where it is visible to both students and staff. (Note: The district is also welcome to order free copies of OSPI's Sexual Harassment Poster, translated into multiple languages: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/posters-and-outreach-materials">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/posters-and-outreach-materials</a>).</p> <p><b>14.3.H:</b> Please provide evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. Training materials or a summary of topics included in the training, including at a minimum the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and</li> </ol>

			<p>respond to discrimination, and (c) the district’s discrimination complaint procedures (3210P and 5010P); <i>and</i></p> <ol style="list-style-type: none"> <li>2. Sign-in sheets documenting attendance or other attestation that all administrators and certificated and classroom personnel have received the training; <i>or</i></li> <li>3. If the district cannot demonstrate that it is currently providing compliant training, please submit a proposed action plan for training all administrators and certificated and classroom personnel regarding civil rights compliance.</li> </ol> <p>This proposed action plan should describe (a) the date the training(s) will occur (no later than the end of the school year); (b) how the district will ensure all administrators and certificated and classroom personnel receive the training (<i>e.g., sign-in sheets, follow-up with employees who miss the training</i>); (c) an outline of what will be included in the training; and (d) which employee will be responsible to provide the training and carry out this action plan.</p> <p><b>Note:</b> The district can use OSPI’s Sample Staff Training Slide Deck (<a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx</a>) or an equivalent presentation.</p>
Civil Rights	14.5	Interpretation and Translation Services	<p><b>14.5.B:</b> The LEA has not yet demonstrated that it has a process for ensuring that interpretation and translation services are provided to communicate vital information with LEP parents. Please develop and then upload a description of the LEA's process, along with the LEA's plan for ensuring implementation of the process.</p> <p>Please describe, at minimum:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided);</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated);</li> <li>3. How the LEA determines which language(s) to translate documents into; and</li> <li>4. How the LEA ensures its employees are informed about to how to access interpreters or translators to communicate with LEP parents.</li> </ol>

			<p><b>14.5.C:</b> The LEA has not yet demonstrated that it has a process for ensuring that its interpreters and translators, including LEA or school employees who perform this role, are qualified and competent to serve in the role of an interpreter or to translate documents. Please develop and then upload a description of the LEA's process, along with the LEA's plan for ensuring implementation of the process.</p> <p>The process must specifically demonstrate, at minimum, how the LEA will ensure all interpreters and translators:</p> <ol style="list-style-type: none"> <li>1. Have knowledge in both languages of any specialized terms or concepts to be used in the communication at issue;</li> <li>2. Are trained on the role of an interpreter and/or translator;</li> <li>3. Are trained on the ethics of interpreting and/or translating; and</li> <li>4. Are trained on the need to maintain confidentiality.</li> </ol>
Civil Rights	14.8	Course and Program Enrollment	<p><b>14.8.A:</b> LEAs need to review, at least annually, course and program enrollment data for each course and program in which not all students enroll to identify and address disproportionalities at each building based on sex, race/ethnicity, EL status, special education status, and Section 504 status. The LEA has not demonstrated that it has such a process.</p> <p>Moving forward, please identify:</p> <ol style="list-style-type: none"> <li>1. When does the review occur? (<i>Year end? End of each term?</i>)</li> <li>2. Who is involved in the reviews? (<i>Who gathers and reports proportionality data to the team(s)? Who analyzes data to determine whether and why disproportionalities exist? Who creates plans to respond to those identified disproportionalities? Will an LEA-level team decide what to do about building-level disproportionalities? Building staff? A combination? Who documents the review process?</i>)</li> <li>3. How are the reviews documented? (<i>Does the LEA internally develop disproportionality reports and analytical tools? OSPI's samples? Homeroom-generated reports plus an analytical tool? Something else?</i>)</li> <li>4. Which courses and programs are reviewed for each school? (<i>For secondary, at a minimum: Honors, AP, CTE, dual credit, specialized PE, pathway, and other specialized courses; Highly Capable (HC),</i></li> </ol>

			<p><i>online, and other specialized programs. For elementary, at a minimum: HC.)</i></p> <p>5. How do team(s) determine whether disproportionalities exist?</p> <p><b>14.8.B:</b> Please upload evidence demonstrating that the LEA has carried out the review process that will be described in response to Item 14.8.A, including:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p><b>Note #1:</b> The LEA is required to review courses and programs at each school. To close out Item 14.8 for the 2018–19 CPR, OSPI will accept the three above-noted types of evidence for only Lopez High School.</p> <p><b>Note #2:</b> It is not sufficient for a school or LEA to submit raw, aggregated, and disaggregated data without analysis. It is also not sufficient to only analyze data relating to sex, without race, EL status, and disability (including special education and Section 504).</p> <p><b>14.8.C:</b> If disproportionalities were identified by the review that will be demonstrated in response to Item 14.8.B, please upload evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, please include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e., root cause analysis</i>).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (<i>e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling</i>).</li> </ol> <p><b>14.8.D:</b> If no disproportionalities were identified by the review that will be demonstrated in response to Item 14.8.B, please clearly indicate.</p>
Civil Rights	14.9	Student Discipline	<p><b>14.9.A:</b> LEAs need to review, at least annually, student discipline data to identify and address disproportionalities at each building based on sex, race/ethnicity, EL status, special education status, and Section 504 status. The LEA has not demonstrated that it has such a process.</p>

Moving forward, please identify:

1. When does the review occur? (*Year end? End of each term?*)
2. Who is involved in the reviews? (*Who gathers and reports proportionality data to the team(s)? Who analyzes data to determine whether and why disproportionalities exist? Who creates plans to respond to those identified disproportionalities? Will a district-level team decide what to do about building-level disproportionalities? Building staff? A combination? Who documents the review process?*)
3. How are the reviews documented? (*Does the district internally develop disproportionality reports and analytical tools? External samples? Homeroom-generated reports plus an analytical tool? Something else?*)
4. What types of corrective and disciplinary actions are included in the data reviewed at each building? (*e.g., suspensions, in-school suspensions, referrals to the office, etc.*) What, if any, comparative data is reviewed by school teams, such as multiple semesters/years of data to identify trends?
5. How do team(s) determine whether disproportionalities exist? How do they determine what next steps to take in response?

**14.9.B:** Please upload evidence demonstrating that the district carried out the review process that will be described in response to Item 14.9.A, including:

1. Student discipline data reviewed;
2. A narrative, report, or meeting minutes that demonstrate how the district or building analyzed the data to identify disproportionalities; *and*
3. A list of any identified disproportionalities.

**Note #1:** The LEA is required to review disaggregated student discipline data for each individual school. To close out Item 14.9 for the 2018–19 CPR, OSPI will accept the three above-noted types of evidence for only Lopez High School.

**Note #2:** It is not sufficient for a school or LEA to submit raw, aggregated, and disaggregated data without analysis. It is also not sufficient to only analyze data relating to sex, without race, EL status, and disability (including special education and Section 504).



			<p><b>14.9.C:</b> If the district identifies any disproportionalities as part of the review process demonstrated in response to Item 14.9.B, please upload evidence that the district or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, please include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e., root cause analysis</i>).</li> <li>2. The LEA or building’s plan to address the disproportionalities to ensure they are not the result of discrimination (<i>e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities</i>).</li> </ol> <p><b>14.9.D:</b> If no disproportionalities were identified by the review that will be demonstrated in response to Item 14.9.B, please clearly indicate.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities	<p><b>14.10.C:</b> Please upload a completed Three-Part Test analysis for each building, using OSPI’s Athletic Opportunities Tool.</p> <p>Download the tool and instructions here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a></p>
Civil Rights	14.11	Annual Athletic Evaluation	<p><b>14.11.A:</b> Please provide evidence that the LEA annually evaluates the girls’ and boys’ athletic programs at each building to identify and address disparities based on each required factor. Please include dated and completed team, building-level, and LEA worksheets and analysis, or the equivalent.</p> <p><b>14.11.B:</b> If any disparities are identified by the process to be demonstrated in response to Item 14.11.A, please describe the LEA’s plan to address each disparity and provide evidence of implementation.</p> <p><b>14.11.C:</b> Please upload a narrative describing the LEA’s process to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.</p> <p>For more guidance, read the "Booster Clubs and Donations" section at: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs</a></p>

Fiscal	15.1	Grant Claims and Expenditures	<p>The Title I application for the 2017/2018 year was not submitted until 12/1/17. Therefore, costs should not have been incurred for the 2017/2018 grant until 12/1/17. The district would have been eligible to spend their 2016/2017 carryover funds totaling \$10,000 from the prior year, however the expenditures exceeding the carryover amount prior to 12/1 were outside of the period of performance. There is approximately \$8,693 that was spent outside of the period of performance for the Title I grant.</p> <p>Please provide an action plan detailing how the district will ensure funds are not spent outside of the period of performance moving forward.</p>
Fiscal	15.2	Accounts Payable Charges	<p>During review of the transaction for Renaissance Learning totaling \$4,072.13, there was no justification completed at the time of the purchase to document the reasoning for using the vendor as sole source.</p> <p>Please provide an action plan detailing how the District will ensure procurement methods will be followed moving forward.</p>

cc:

David Sather, CPR Contact, Lopez School District

Marina Steinbrueck, Civil Rights Contact, Lopez School District

Nicole Courtney, CPR Contact, Lopez School District

**From:** timothy.mcneely@k12.wa.us  
**To:** bauckland@lopezislandschool.org;  
**Subject:** Closing Out Consolidated Program Review (CPR) 2018-19  
**Attachments:** No attachments found for this message.

January 22, 2020

Good morning, Superintendent Auckland.

OSPI is looking to close out 2018-19 reviews. Currently, our system shows that Lopez is overdue with its response. Please work with your staff to respond to the following outstanding items *no later than February 5*. Items include: 7.3, 7.5, 12.1, 12.3, 12.6, 12.7, 12.8, 12.9, 14.2, 14.3, 14.5, 14.8, 14.9, 14.10, 14.11, 15.1, 15.2, 17.2.

Guidance regarding those items has been provided in Program Monitor. Staff are encouraged to contact our monitors with any questions they may have.

Thanks to you and your staff.

Timothy

--

Timothy McNeely

Pronouns: he, him, his

Director, Consolidated Program Review (CPR) & Rural Education

Special Programs & Federal Accountability

Office of Superintendent of Public Instruction (OSPI)

P.O. Box 47200 | Olympia, WA 98504-7200

office: 360-725-6234

timothy.mcneely@k12.wa.us

www.k12.wa.us

All students prepared for post-secondary pathways, careers, and civic engagement.

**District Follow-up Completed**

**From:** emurray@lopezislandschool.org

**To:** [tony.may@k12.wa.us](mailto:tony.may@k12.wa.us); [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us); [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us); [pat.smithson@k12.wa.us](mailto:pat.smithson@k12.wa.us); [mike.donlin@k12.wa.us](mailto:mike.donlin@k12.wa.us); [Jody.Hess@k12.wa.us](mailto:Jody.Hess@k12.wa.us); [Debbie.Crawford@k12.wa.us](mailto:Debbie.Crawford@k12.wa.us); [tony.may@k12.wa.us](mailto:tony.may@k12.wa.us); [peggy.carlson@k12.wa.us](mailto:peggy.carlson@k12.wa.us); [cara.patrick@k12.wa.us](mailto:cara.patrick@k12.wa.us); [amy.harris@k12.wa.us](mailto:amy.harris@k12.wa.us); [jamey.schoeneberg@k12.wa.us](mailto:jamey.schoeneberg@k12.wa.us); [deifi.stolz@k12.wa.us](mailto:deifi.stolz@k12.wa.us); [stacie.boyd@k12.wa.us](mailto:stacie.boyd@k12.wa.us); [veronica.gallardo@k12.wa.us](mailto:veronica.gallardo@k12.wa.us); [melinda.dyer@k12.wa.us](mailto:melinda.dyer@k12.wa.us); [sarah.albertson@k12.wa.us](mailto:sarah.albertson@k12.wa.us); [shannon.martin@k12.wa.us](mailto:shannon.martin@k12.wa.us); [Samantha.Sanders@k12.wa.us](mailto:Samantha.Sanders@k12.wa.us);

**CC:** cpr@k12.wa.us

**Subject:** Lopez School District Follow-Up Completed

**Attachments:** No attachments found for this message.

3/7/2022

TO: Tony May, CPR Team Lead

FROM:

Marina Steinbrueck, Civil Rights Contact, Lopez School District

Nicole Courtney, CPR Contact, Lopez School District

Martha Martin, CPR Contact, Lopez School District

RE: LEA Follow-Up Completed

The follow-up documentation for Lopez School District has been submitted and is ready for OSPI review and approval.

[Link to checklist](#)

**Final Approval Completed**

**From:** Jason.Miller@k12.wa.us  
**To:** emurray@lopezislandschool.org  
**CC:** [msteinbrueck@lopezislandschool.org](mailto:msteinbrueck@lopezislandschool.org); [nicolec@ncesd.org](mailto:nicolec@ncesd.org);  
[mmartin@lopezislandschool.org](mailto:mmartin@lopezislandschool.org); [tony.may@k12.wa.us](mailto:tony.may@k12.wa.us); [cpr@k12.wa.us](mailto:cpr@k12.wa.us)  
**Subject:** Final Approval for Lopez School District for Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

3/30/2022

TO: Ed Murray, Superintendent  
Lopez School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 3/27/2019-3/30/2022 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

--

cc:

Marina Steinbrueck, Civil Rights Contact, Lopez School District

Nicole Courtney, CPR Contact, Lopez School District

Martha Martin, CPR Contact, Lopez School District

Tony May, CPR Team Lead, Office of Superintendent of Public Instruction

## MOA CPR Program Monitor Reports 2019–2020

The following LEAs received an MOA CPR Program Monitor desk review that began during the 2019–2020 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish, unless otherwise noted.

- Central Kitsap School District
- Colville School District
- Mead School District
- North Kitsap School District
- East Valley School District (Spokane) School District
- Medical Lake School District
- Sequim School District
- LaCrosse School District
- Liberty School District
- Odessa School District (Moved to 2020–21)
- Reardan School District
- Lind School District (Moved to 2020–21)
- Ritzville School District (Moved to 2020–21)

**Review Scheduled**

**From:** timothy.mcneely@k12.wa.us  
**To:** erinp@ckschools.org  
**CC:** soniab@ckschools.org; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Central Kitsap School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Erin Prince, Superintendent  
Central Kitsap School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/16/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical



Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Review**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the review date indicated (1/16/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <http://www.k12.wa.us/ConsolidatedReview/>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Sonia Barry, Assistant Director Student Services, Central Kitsap School District

## **Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us

**To:** erinp@ckschools.org

**CC:** soniab@ckschools.org; franklyn@ckschools.org; paulab@ckschools.org; jeanneb@ckschools.org; Timothy.McNeely@k12.wa.us; timothy.mcneely@k12.wa.us; Gayle.pauley@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Dierk.Meierbachtol@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; isaac.conver@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - Central Kitsap School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/24/2020

TO: Erin Prince, Superintendent  
Central Kitsap School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
11. Highly Capable	District is commended for thorough consideration of the needs of teaching staff for professional learning. Description of all offerings and participation by staff is exemplary.
19. Tribal Consultation	The Central Kitsap School District is commended for engaging in meaningful, ongoing, and timely tribal consultation with the Suquamish Tribe and the Port Gamble S'Klallam Tribe with evidence of establishing goals, making progress toward those goals, including implementation of the <i>Since Time Immemorial</i> tribal sovereignty curriculum.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	Item 6.1: The district should seek annual school board approval for all out-of-endorsement teaching assignments per WAC 181-82-110, including those teachers in alternative learning environments or middle school block assignments.
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Moodle. Self-register to open your own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>
15. Fiscal	Procurement Using Federal Funds thresholds for Services is set at a more restrictive rate (Services \$10,000- \$75,000 and \$75,000 +) than the Office of Management and Budget has set (\$10,000-\$250,000 and \$250,000+) A District may be more restrictive, but I am bringing it to the attention of the District. See 15.2.B Federal Funds Procurement Attachment.

Imagine Learning Contract: The contract was executed September 29, 2017, however, sole source support and SAM search for debarment was in November 2017. This documentation should be obtained prior to execution.

Parent and Family Engagement: 56 participants based on sign-in sheets. However, they look to be parent signatures only and don't account for the students that participated. All participants need to sign-in, or it looks like you spent \$15.75 pp for the 56 participants. I have uploaded (under 15.2) the Parent and Family Engagement Allowable Costs documents. The fourth column list the evidence/documentation necessary to support charges.

**Action Plan(s) Approved**

Program	Number	Description
Title III/TBIP	7.3	Title III-Eligible Native American Students

**Evidence Needed**

Program	Number	Description	Evidence
Homeless	10.8	Early Childhood	Please provide further evidence describing the types of Early Education programs within the LEA and how you are coordinating your programs.
Highly Capable	11.3	Equitable Identification of Low-Income Students	Please clarify use of "1% margin of error" and adjusting the percentile "based on building specific local norms" (p. 5 of 33).
Highly Capable	11.6	Program Evaluation	Please include data used to evaluate student achievement of identified HiCap students.
Civil Rights	14.9	Student Discipline	Please submit evidence for two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable):  B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:

			<p>(1) A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</p> <p>(2) A list of identified disproportionalities.</p> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <p>(1) A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (i.e., root cause analysis).</p> <p>(2) The LEA or building's plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</p>
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title II, Part A	6.1	Teacher Professional Qualifications	<p>Please provide evidence of school board approval for teachers identified as out-of-endorsement highlighted in light yellow in the spreadsheet titled "CPR-CentralKitsap-Item6.1-Determinations-01082020.xlsx" uploaded to Program Monitor for Item 6.1.</p> <p>For teachers highlighted in other colors in the spreadsheet uploaded, please review teacher/student/course information in the district's student information system (SIS) to ensure correct CEDARS reporting. TIIA will review CEDARS changes in the Educator Equity Data Collection application once district submits CPR follow-up.</p>
Title III/TBIP	7.1	Identification	Using ELPA21 testing and accurate CEDARS reporting, correct any errors that cause students to appear on the Possible Eligible Not Reported list. For each student who

			<p>continues to appear on the PENR list, indicate the district's determinations or next steps.</p> <p>Submit an action plan for ensuring that all potential ELs, including those who qualify for Special Education and those with high levels of academic achievement, follow a consistent process for EL identification and are assessed with the ELPA21 screener within 10 school days of enrollment.</p> <p>Submit an action plan for monitoring students who are under a parent waiver and for annually assessing these students with the state English language proficiency assessment.</p> <p>See <a href="https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf">https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf</a> for guidance.</p>
Title III/TBIP	7.4	Staff Qualifications	Please submit an action plan for ensuring that certificated teachers who design/oversee English language development services delivered by paraeducators are qualified to do so.
Title III/TBIP	7.5	English Language Development Services	<p>Submit an action plan for ensuring that all eligible English learners at the secondary level and that all English learners who also qualify for Special Education receive English language development instruction delivered/designed by qualified staff that is appropriate for their language proficiency level. Services must support the language domains of Speaking, Listening, Reading, and Writing.</p> <p>Program services for each student must be designed and reasonably calculated to enable students to attain English proficiency within a reasonable length of time. Include the staffing plan.</p>
Highly Capable	11.1	Annual Public Announcement of ID Activity	Please remove "cut" scores from procedures. References to "cut" scores required on standardized assessments is not appropriate use of "multiple criteria" (ex. p. 10 refers to CogAT of 124 and 94-99 percentile achievement). Consideration of "multiple criteria" requires all data to be reviewed for each referred student to determine if the preponderance of evidence indicates the need for HiCap services.

Highly Capable	11.2	Identification Process & Consent	Please remove references to combined standardized “cut” scores. Board policy references the 2017 and 2018 changes in law; however, December 2014 Procedures rely on students achieving multiple “cut” scores on standardized assessments. Percentile scores rather than scale scores are combined which is not appropriate assessment practice. Also, the preponderance of evidence is to be considered as a whole for each student.
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	B: Please provide 2019-20 official membership roster, official charter letter or paid invoices for FBLA and HOSA for Olympic High School.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	B: The district's nondiscrimination procedure for employees, 5010P, is noncompliant and needs to be revised. Please submit a revised 5010P (WSSDA's model procedure is compliant).  H: Please submit revised training materials that include additional information on employee responsibilities to respond to reports of discrimination and references to student-focused nondiscrimination and sexual harassment policies and procedures.

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Sonia Barry, CPR Contact, Central Kitsap School District

Franklyn MacKenzie, CPR Contact, Central Kitsap School District

Paula Bailey, Fiscal Contact, Central Kitsap School District

Jeanne Beckon, Civil Rights Contact, Central Kitsap School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction



## Preliminary Compliance Report

**From:** Timothy.McNeely@k12.wa.us

**To:** erinp@ckschools.org

**CC:** soniab@ckschools.org; franklyn@ckschools.org; paulab@ckschools.org; jeanneb@ckschools.org; Timothy.McNeely@k12.wa.us; timothy.mcneely@k12.wa.us; Gayle.pauley@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Dierk.Meierbachtol@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; isaac.conver@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 REVISED Report - Central Kitsap School District

**Attachments:** No attachments found for this message.



### **SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

1/27/2020

TO: Erin Prince, Superintendent  
Central Kitsap School District

FROM: Gayle Pauley, Assistant Superintendent  
Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 REVISED Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) conducted a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items currently reported or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendations:**

Program	Commendation Note
11. Highly Capable	District is commended for thorough consideration of the needs of teaching staff for professional learning. Description of all offerings and participation by staff is exemplary.
19. Tribal Consultation	The Central Kitsap School District is commended for engaging in meaningful, ongoing, and timely tribal consultation with the Suquamish Tribe and the Port Gamble S'Klallam Tribe with evidence of establishing goals, making progress toward those goals, including implementation of the <i>Since Time Immemorial</i> tribal sovereignty curriculum.

**Technical Assistance:**

Program	Technical Assistance Note
6. Title II, Part A	Item 6.1: The district should seek annual school board approval for all out-of-endorsement teaching assignments per WAC 181-82-110, including those teachers in alternative learning environments or middle school block assignments.
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Moodle. Self-register to open your own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>
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**Action Plan(s) Approved**

Program	Number	Description
Title III/TBIP	7.3	Title III-Eligible Native American Students

**Evidence Needed**

Program	Number	Description	Evidence
Homeless	10.8	Early Childhood	Please provide further evidence describing the types of Early Education programs within the LEA and how you are coordinating your programs.
Civil Rights	14.9	Student Discipline	<p>Please submit evidence for two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable):</p> <p>B. Evidence of implementation of the above process for the 2018–19 or 2019–20 school year. Evidence must include at least the following:</p> <p>(1) A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</p> <p>(2) A list of identified disproportionalities.</p> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to</p>

			<p>ensure it is not the result of discrimination. Evidence must include the following:</p> <p>(1) A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</p> <p>(2) The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</p>
--	--	--	--

**Noncompliant Items:**

Program	Number	Description	Actions Required
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Title III/TBIP	7.1	Identification	<p>Using ELPA21 testing and accurate CEDARS reporting, correct any errors that cause students to appear on the Possible Eligible Not Reported list. For each student who continues to appear on the PENR list, indicate the district's determinations or next steps.</p> <p>Submit an action plan for ensuring that all potential ELs, including those who qualify for Special Education and those with high levels of academic achievement, follow a consistent process for EL identification and are assessed</p>

			<p>with the ELPA21 screener within 10 school days of enrollment.</p> <p>Submit an action plan for monitoring students who are under a parent waiver and for annually assessing these students with the state English language proficiency assessment.</p> <p>See <a href="https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf">https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf</a> for guidance.</p>
Title III/TBIP	7.4	Staff Qualifications	<p>Please submit an action plan for ensuring that certificated teachers who design/oversee English language development services delivered by paraeducators are qualified to do so.</p>
Title III/TBIP	7.5	English Language Development Services	<p>Submit an action plan for ensuring that all eligible English learners at the secondary level and that all English learners who also qualify for Special Education receive English language development instruction delivered/designed by qualified staff that is appropriate for their language proficiency level. Services must support the language domains of Speaking, Listening, Reading, and Writing.</p> <p>Program services for each student must be designed and reasonably calculated to enable students to attain English proficiency within a reasonable length of time. Include the staffing plan.</p>
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>B: Please provide 2019-20 official membership roster, official charter letter or paid invoices for FBLA and HOSA for Olympic High School.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>B: The district's nondiscrimination procedure for employees, 5010P, is noncompliant and needs to be revised. Please submit a revised 5010P (WSSDA's model procedure is compliant).</p> <p>H: Please submit revised training materials that include additional information on employee responsibilities to respond to reports of discrimination and references to</p>

			student-focused nondiscrimination and sexual harassment policies and procedures.
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Sonia Barry, CPR Contact, Central Kitsap School District

Franklyn MacKenzie, CPR Contact, Central Kitsap School District

Paula Bailey, Fiscal Contact, Central Kitsap School District

Jeanne Beckon, Civil Rights Contact, Central Kitsap School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

## **Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** erinp@ckschools.org  
**CC:** soniab@ckschools.org;franklyn@ckschools.org;paulab@ckschools.org;jeanneb@ckschools.org;  
timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 Central Kitsap School District Review Needs Work  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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**Chris Reykdal** Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/30/2021

TO: Erin Prince, Superintendent  
Central Kitsap School District

FROM: Timothy McNeely, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**

**Evidence Needed** No evidence needed items found for this checklist.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.1	Identification	<p>Please respond to the following:</p> <p>Using ELPA21 testing and accurate CEDARS reporting, correct any errors that cause students to appear on the Possible Eligible Not Reported list. For each student who continues to appear on the PENR list, indicate the district's determinations or next steps. This is not asking for an action plan. There continue to be 17 students on the district's PENR. For these students, resolve the errors or provide an explanation if the student is not eligible.</p> <p>Submit an action plan for monitoring students who are under a parent waiver and for annually assessing these students with the state English language proficiency assessment.</p> <p>See <a href="https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf">https://ncela.ed.gov/files/english_learner_toolkit/7-OELA_2017_optout_508C.pdf</a> for guidance.</p>
Title III/TBIP	7.5	English Language Development Services	<p>The action plan addresses the strategies that the district will implement to support access to content instruction (for example, placement with a SIOP-trained teacher). Please clarify how the district ensures that every English learner receives designated ELD instruction.</p>

cc:

Sonia Barry, CPR Contact, Central Kitsap School District

Franklyn MacKenzie, CPR Contact, Central Kitsap School District

Paula Bailey, Fiscal Contact, Central Kitsap School District

Jeanne Beckon, Civil Rights Contact, Central Kitsap School District



**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** erinp@ckschools.org  
**CC:** [soniab@ckschools.org](mailto:soniab@ckschools.org); [franklyn@ckschools.org](mailto:franklyn@ckschools.org); [paulab@ckschools.org](mailto:paulab@ckschools.org);  
[jeanneb@ckschools.org](mailto:jeanneb@ckschools.org); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** Final Approval for Central Kitsap School District for Consolidated Program Review (CPR)  
2019-20  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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5/5/2021

TO: Erin Prince, Superintendent  
Central Kitsap School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/16/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

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cc:

Sonia Barry, CPR Contact, Central Kitsap School District

Franklyn MacKenzie, CPR Contact, Central Kitsap  
School District

Paula Bailey, Fiscal Contact, Central Kitsap School  
District

Jeanne Beckon, Civil Rights Contact, Central Kitsap  
School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us

**To:** pete.lewis@colsd.org

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Colville School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Pete Lewis, Superintendent  
Colville School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/16/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (1/16/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us  
**To:** pete.lewis@colsd.org  
**CC:** rcloke@colsd.org;susan.clark@colsd.org; Timothy.McNeely@k12.wa.us;  
haley.lowe@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - Colville School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/17/2020

TO: Pete Lewis, Superintendent  
Colville School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
15. Fiscal	District staff were great to work with. They submitted all requested items in a timely manner and consistently demonstrated professionalism, great communication, and knowledge of subject matters. Thank you for all your hard work! It has been a pleasure working with you.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	Item 6.3: District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.
11. Highly Capable	Please schedule the Highly Capable Board Policy for review and revision. The provisions passed in 2017 and 2018 (prioritize equitable identification of low-income students and criteria for identification)) are to be included in Board Policy and reflected in the procedures. Procedures linked on the district's website (April 2019) are not current and should be reviewed and revised.
12. CTE/Pe rkins	12.5.D: Recommendation to add signature and date lines to the training plans for conditionally certified instructors in order to be completed at the time of the PGP meeting. Please use the PESB website link provided on what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a>
14. Civil Rights	<p><b>14.1: Training for Compliance Coordinators.</b> The Title IX Officer is encouraged to begin by reviewing the following:</p> <ul style="list-style-type: none"> <li>• Sexual Harassment: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/sexual-harassment">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/sexual-harassment</a></li> <li>• Complaint Filing Procedure: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/complaints-about-discrimination">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/complaints-about-discrimination</a></li> <li>• Equity in Athletics: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs</a></li> </ul>

Additional training resources (for all coordinators) are found here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights> (Item 14.1, Sample Self-Training Checklist).

**14.3: Complaint Procedures.** Resources, including sample handbook language and a sample staff training, can be found here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights> (Item 14.3).

**14.4: Section 504.** The district is encouraged to continue to draft detailed accommodations, individually-tailored to each student's specific needs. Make sure that general terms (e.g., "preferential seating" or "extended time") are defined clearly so there is no confusion.

**14.8: Annual CPE Data Review.** Consider using OSPI worksheets in all buildings to facilitate data collection and tracking over time. Consider reviewing each specialized course in a particular program separately, rather than grouping them all together, which can cause disproportionalities to be unintentionally masked. For example, assume a district with 50% boys and 50% girls has two CTE courses, Pre-Nursing and Auto Shop. When the district analyzes both CTE courses together, the data shows that the CTE program as a whole is evenly split between genders, 50/50. However, when the district analyzes each class separately, it learns that there are significant gender disproportionalities, with girls making up most of the pre-nursing course and boys making up most of the auto shop class. These would likely be considered significant disproportionalities, and the district would want to conduct a root cause analysis to determine why the disproportionality exists in each course, and then devise an action plan to counter it.

**14.9: Annual Student Discipline Data Review.** The district is encouraged to simplify its review by creating one district-wide review process that is used in each building. The process should include: 1) when the review occurs, 2) who is involved in the reviews, 3) how the reviews are documented, 4) what behaviors are reviewed (i.e., only suspension and expulsions are required), and 5) how the LEA determines whether significant disproportionalities exist. The district could also provide review teams with worksheets to help streamline the data analysis, so that it is consistent between buildings and from year-to-year.

**14.10: Athletics Interests and Abilities.** OSPI survey (required): <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/student-athletic-interest-survey>. OSPI survey results worksheets (recommended): <https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx>. OSPI Athletic Opportunities Worksheet (required): <https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiesstool.zip>.



**14.11: Annual Athletics Evaluation.** Team, building, and district worksheets: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs> (scroll to Worksheets for Team, Building, and District).

☐ Sexual Harassment:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/sexual-harassment>

☐ Complaint Filing Procedure:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/complaints-about-discrimination>

☐ Equity in Athletics:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs>

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☐ Sexual Harassment:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/sexual-harassment>

☐ Complaint Filing Procedure:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/complaints-about-discrimination>

☐ Equity in Athletics:<https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs>

**Action Plan(s) Approved**

Program	Number	Description
Civil Rights	14.2	Nondiscrimination Statement

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part A	1.14	Parent and Family Engagement Accessibility	Provide a description of how the district's Title I schools provide opportunities and a variety of times to engage parents and families in meetings, activities, trainings and conference. Please provide evidence of meeting agendas from 2 schools and conference schedules for 2 schools.

Title I, Part A	1.15	Schoolwide Program	Provide an updated schoolwide program plan for the 2019-20 school year by 3/1/2020 for Fort Colville elementary that includes all 4 components.
Title I, Part A	1.16	Schoolwide Program Evaluation	Please provide a 2018-19 school year Title I program evaluation description for the Fort Colville Elementary school that addresses the following 4 areas:  1. Was the Title I, Part A program effective?  2. What worked well in the Title I, Part A program?  3. What did not work well in the Title I, Part A program?  4. How did the Title I, Part A program change to better benefit students for the 2019-20 school year?
Title II, Part A	6.1	Teacher Professional Qualifications	Please provide evidence of school board approval for teachers identified as out-of-endorsement highlighted in light yellow in the spreadsheet titled "CPR-Colville-Item6.1-Determinations-01162020.xlsx" uploaded to Program Monitor for Item 6.1.  For teachers highlighted in other colors in the spreadsheet uploaded, please review teacher/student/course information in the district's student information system (SIS) to ensure correct CEDARS reporting. TIIA will review CEDARS changes in the Educator Equity Data Collection application once district submits CPR follow-up.
Homeless	10.3	Transportation	Please provide additional evidence (if available) of written agreements, in-lieu process, request forms, etc. to show that both districts are working together to apportion cost and responsibility of transportation.
Homeless	10.4	LEA Liason	Please provide evidence to show the FTE of the liaison, and that the liaison has the time/capacity to fulfill all duties outlined in the law. (Provide a signed attestation or other evidence.)

Homeless	10.6	Enrollment, Intake, and Access	Provide evidence of updated intake forms and clarify intake process. Students in foster care are not covered under McKinney-Vento, and forms are not current with McKinney-Vento/ESSA reauthorization . Please clarify process for intake, as it was not clear if the family is completing the forms, or the district staff. Thank you.
Homeless	10.7	Unaccompanied Homeless Youth: Higher Education/FAFSA	Please provide additional evidence to show that unaccompanied students are provided FAFSA verification letters. Document in evidence is only partially completed. Please supply other completed forms to show the district is ensuring opportunities for higher ed/FAFSA/etc.
Homeless	10.8	Early Childhood	Please provide updated Child Find notice that includes the required language pertaining to access to developmental screening for families who are not residents in the district. See OSPI website for approved sample form.
Homeless	10.10	Posting of Rights and Parent Information	Please provide information about locations of posters in school buildings and in the community. (List of locations will suffice.)  Provide evidence to show that the NCHE parent brochure is readily available in all schools.
Highly Capable	11.2	Identification Process & Consent	Please provide assessment matrix described in identification procedure. Include explanation of its use, and one example for a student identified and one example for a student not identified.
Highly Capable	11.5	Program Services	Please include record of this student's program for school years prior to 2019.
Highly Capable	11.6	Program Evaluation	Please include data that was reviewed for each of the three elements of the evaluation.
Private Schools	13.2	Complaint Process	Please provide an assurance statement that the most current version of the complaint procedures has been reviewed with the private schools.

OSSI	16.2	School Improvement Plans	<p>B – Please briefly elaborate on which best practices you have documented in your school improvement plan and how they are used; in addition, please briefly describe your MTSS implementation.</p> <p>C – Please describe the process of documenting one-on-one family feedback and incorporating it into the school improvement plan.</p> <p>D – Please submit a revised School Improvement Plan: refer to OSPI's Optional Consolidated School Improvement Plan Template to gain guidance on required elements including but not limited to:</p> <ul style="list-style-type: none"> <li>• a school needs assessment</li> <li>• data used in completing a school needs assessment</li> <li>• recognizing nonacademic student learning and growth</li> <li>• characteristics of successful schools</li> <li>• educational equity factors</li> <li>• 3 schoolwide goals or priorities</li> <li>• timeframes for implantation of activities</li> </ul>
Foster Care	17.2	Collaboration with Local Child Welfare Agency	<p>17.2.B. Please upload evidence of regular and on-going communication between district staff and staff at DCYF.</p> <p>All submitted evidence for this item is from a previous school year.</p>
Title IV, Part A	18.1	Comprehensive Needs Assessment	<p>Based on the LEA's current 211 form package application, it is understood that the LEA will be participating in Title IV, A. Please provide documentation accordingly.</p>
Title IV, Part A	18.2	Distribution of Funds	<p>Based on the LEA's current 211 form package application, it is understood that the LEA will be participating in Title IV, A. Please provide documentation accordingly.</p>

Title IV, Part A	18.4	Program Activities	Based on the LEA's current 211 form package application, it is understood that the LEA will be participating in Title IV, A. Please provide documentation accordingly.
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title I, Part A	1.5	95 Percent Student Participation in Statewide Mathematics and Reading/Language Arts Assessments	Please complete and upload a School Improvement Plan Summary: 95% Participation Rate on State Assessments template for Fort Colville Elementary. Template is located at <a href="https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review">https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review</a>
Title I, Part A	1.12	School Parent Family Engagement Policy/Plan	Provide a completed OSPI Action Plan template that outlines the actions and timeline that the Fort Colville Elementary School will implement and document prior to the ending of the 2019-20 school year the following requirements of the Parent Family Engagement plan: (1) annual Title I meeting, (2) distribution of the PFE plan, (3) information to parents about the school's curriculum, required state and district assessments and the achievement levels students must meet.
Title III/TB IP	7.1	Identification	7.1.A. Two students who are not bilingual appear to have been screened and served. Please provide evidence that family indicated an affirmative answer to the qualifying questions on the HLS for each student. 8662874243 and 8199077489  7.1.A Please update placement protocols to reflect the state adopted language proficiency levels.  7.1.B. On the webpage, the statement "parents prefer to receive communication from school in a language other than English, " is not

			<p>consistent with the state procedures for screening. These procedures can be found at <a href="https://www.k12.wa.us/sites/default/files/public/migrantbilingual/pubdocs/ADA-tbipguidelinesidentification.pdf">https://www.k12.wa.us/sites/default/files/public/migrantbilingual/pubdocs/ADA-tbipguidelinesidentification.pdf</a></p>
Title III/TBIP	7.4	Staff Qualifications	<p>Also referenced documents in 7.8 and 7.9, While attempting to hire an EL or bilingual certificated teacher, please provide evidence of regular training throughout the year and follow up support provided to employee RC.</p> <p>Please provide documentation that all paraprofessionals providing services to ELs are in close supervision of an EL or bilingual certificated teacher. Please include evidence that instruction is planned and evaluated by a teacher who has SLA training.</p>
Title III/TBIP	7.13	TBIP Eligible Exited Students	<p>7.13.A Please provide evidence of monitoring and delivery of services.</p> <p>Per our phone conversation on 1/7/20, please upload an Action Plan that will implement services to exited students as soon as possible and that services will be provided throughout the school year after this funding cycle. Please identify the method by which you'll determine risk, who will be responsible for monitoring and referral, a menu of supports available to exited students, and a person who will be responsible for providing instruction after a referral.</p>
Homeless	10.5	Identification of Students	<p>Please show evidence of updated housing questionnaires and intake forms and clarification regarding the way the forms are disseminated to families. Current forms include questions that may be outdated and/or inappropriate.</p> <p>Please provide evidence to show that school district staff have been offered/received training, including sign-in logs and evidence to show attendance.</p>
Civil Rights	14.1	Compliance Coordinators	<p>B: Evidence of Training</p> <p>Title IX: Once the Title IX Officer has attended the Title IX training in February, please upload an agenda or other summary of what materials/topics were covered during the training. Since it is likely that this training only covers federal law, it might also be a good idea for him to review material on his obligations under Washington law. See the Technical Assistance Section of this report for suggestions on which OSPI resources to start with.</p>

			Section 504: The Section 504 Coordinator also still needs to submit evidence he has obtained Section 504 training.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>F: Employee Handbook. The list of policies/procedures that employees are required to review did not seem to include the discrimination complaint procedure (5010P or equivalent).</p> <p>Please confirm whether employees are required to review that procedure and how that occurs (e.g., on their own, in a faculty meeting, etc.)</p> <p>H: Employee Training. The snapshots of the Safe Schools modules do not focus on the right areas of law.</p> <p>Please draft an action plan describing how the district will ensure that all district administrators and certificated and classified staff will be trained on civil rights compliance in the 2019-20 school year. Make sure to include the date by which this will occur, how the district will document attendance and completion, a summary of what material will be covered, and who will be responsible for conducting the training. Access a model training available for district use here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> (scroll to Item 14.3).</p>
Civil Rights	14.5	Interpretation and Translation Services	<p>B: Without additional explanation and context, it is hard to understand what steps the district has in place to determine when interpretation services are needed, how the district determines which documents need to be translated (and into which languages), and how the district's staff is trained to access services.</p> <p>Please submit a narrative that responds to each of the prompts. Make sure the narrative explains how the evidence that was submitted is used.</p>
Civil Rights	14.8	Course and Program Enrollment	<p><b>A: Process.</b></p> <p>CHS: The following issues were identified with the process submitted.</p> <ol style="list-style-type: none"> <li>1. It did not identify the specific courses/programs that are reviewed each year.</li> <li>2. It did not specify how the team determines if a disproportionality is "significant." For example, perhaps a disproportionality of +/- 5%? 7%? Etc.</li> </ol> <p>Please supplement the high school's process to include responses to 1 and 2 above.</p>

		<p>CJHS: The district did not submit a process for the junior high. Please submit the process that is used by the junior high, and make sure it includes responses to all required prompts.</p> <p>HES: Same issues as those identified for the high school. Same corrective action required.</p> <p><b>B: Evidence of implementation.</b></p> <p>CHS:</p> <ul style="list-style-type: none"> <li>• Data: Please submit evidence that the district reviewed all specialized course and program enrollment (CPE) data and disaggregated it by race, sex, EL status, Section 504 status, and special education status. The data submitted was only for one class, and it only had race and sex data. Using OSPI data worksheets would be a good way to document that the high school is collecting and reviewing the right data.</li> <li>• Work Product: Once the district has collected and reviewed all data, please submit work product demonstrating how the LEA or building analyzed the data to identify disproportionalities and listing any significant disproportionalities.</li> </ul> <p>CJHS:</p> <ul style="list-style-type: none"> <li>• Data: The district did not complete the CJHS Hi-Cap worksheet. If the district has a Hi-Cap program at CJHS, please complete this worksheet and analyze the data as required.</li> <li>• Work Product: Nothing further needed for CTE. For Hi-Cap, once the district has collected and reviewed its data, please submit work product demonstrating how the LEA or building analyzed the data to identify disproportionalities and listing any identified disproportionalities.</li> </ul> <p>HES:</p> <ul style="list-style-type: none"> <li>• Data: No data was submitted. Please submit required data.</li> <li>• Work Product: Once the district has collected and reviewed its data, please submit work product demonstrating how the LEA or building analyzed the data to identify disproportionalities and listing any significant disproportionalities.</li> </ul> <p><b>C: Plans addressing significant disproportionalities.</b></p>
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			CHS/CJHS/HES: Once the district has completed its review of all specialized courses and programs in each building, please explain the corrective actions that the district will implement to try to address any significant disproportionalities.
Civil Rights	14.9	Student Discipline	<p>A: Process. If the district uses one review process in all buildings, please submit that process, and make sure it clearly addresses each of the required prompts. If the district uses a different process in each building, please submit the processes for CHS, CJHS, and one elementary school, making sure that they each clearly address the required prompts.</p> <p>B: Evidence of Implementation. If the district uses one review process in all buildings, please submit that process, and make sure it clearly addresses each of the required prompts. If the district uses a different process in each building, please submit the processes for CHS, CJHS, and one elementary school, making sure that they each clearly address the required prompts.</p> <p>C: Plans to Address Significant Disproportionalities. If significant disproportionalities were identified in any building, please submit, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ul style="list-style-type: none"> <li>• A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>• The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</li> </ul>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>B: Survey Results for Each Building</p> <p>Please submit the survey results for each building offering interscholastic athletics, disaggregated by sex. It may be simplest to use OSPI's Survey Results Summary Worksheet, available here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx</a>.</p> <p>C: Athletics Opportunities Workbook (Three-Part Test analysis)</p> <p>Please submit a completed Athletics Opportunities Worksheet for each building offering interscholastic athletics. Note that this is an annual</p>

			<p>requirement, so the LEA will need to submit the most recent analysis, ideally from the 2018-19 or 2019-20 school years. Download the workbook and instructions here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiesool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiesool.zip</a>.</p>
Civil Rights	14.1	Annual Athletic Evaluation	<p>B: Evidence of Implementation. Please submit additional team worksheets from the high school and junior high school for review. Additionally, please submit building worksheets (if used) for review.</p> <p>C: Disparities Identified. The district only submitted two team worksheets for review, but declared "no disparities" are present in the high school or junior high school athletics programs. Please clarify how the district arrived at this conclusion. Were other worksheets perhaps reviewed that weren't uploaded? Does the district have another process for analyzing its athletics programs with regard to each Title IX required factor?</p> <p>D: Outside Sources of Funding. Please supplement the description by describing exactly how outside sources of athletics funding are tracked, monitored, and accounted for by the ASB, specifically for purposes of ensuring sex equity.</p>
Fiscal	15.2	Accounts Payable Charges	<p>The district uses KCDA as their purchasing cooperative, which is allowable and encouraged when possible, however there are steps required when piggybacking off a third party contract that the district did not comply with.</p> <p>1. The district did not perform their own suspension and debarment verification, which is required regardless of whether the third party did so.</p> <p><b>Technical Assistance:</b> Please review the attached document (specifically pages 5-6) for requirements regarding piggybacking when using federal funds. We encourage the district to ensure that they are following these guidelines when using third party contracts for procuring goods or services with federal funds.</p> <p>Please submit an <b>action plan</b> describing how the district ensures they will implement procedures to meet compliance requirements in regards to using third party contracts when procuring goods or services using federal funds. Make sure to address suspension and debarment verifications as well as the procedures described in pages 5-6 of the SAO guidance document attached below.</p>

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Randy Cloke, CPR Contact, Colville School District

Susan Clark, Fiscal Contact, Colville School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** pete.lewis@colsd.org  
**CC:** rcloke@colsd.org;heather.judd@colsd.org; timothy.mcneely@k12.wa.us  
**Subject:** 2018-19 Colville School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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5/22/2020

TO: Pete Lewis, Superintendent  
Colville School District

FROM: Timothy McNeely, Team Lead

RE: 2018-19 Review Needs Work

*Per your LEA's request to continue to complete follow-up for CPR, after reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.*

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title I, Part A	1.5	95 Percent Student Participation in Statewide Mathematics and	Please complete and upload a 95% Participation Rate on State Assessments template for Fort Colville Elementary. Template is located

		Reading/Language Arts Assessments	at <a href="https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review">https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review</a>
Civil Rights	14.8	Course and Program Enrollment	<p><b>CHS:</b></p> <ul style="list-style-type: none"> <li>· B - Data: Please submit evidence that the district reviewed its college in the high school and AP course and program enrollment data and disaggregated it by race, sex, EL status, Section 504 status, and special education status.</li> <li>· B - Work Product: Please submit any additional evidence that explains what the review team discussed (i.e., narrative, meeting minutes, etc.).</li> </ul>
Civil Rights	14.9	Student Discipline	<p><b>B - Evidence of implementation.</b> Please submit the following evidence:</p> <ul style="list-style-type: none"> <li>· <b>CHS:</b> Please provide data showing that the district disaggregated student discipline data by all required categories. The existing list does not appear to capture EL, Section 504, or Special Education students. Please submit any additional narratives, reports, or meeting minutes that more fully describe how the district analyzed its data to determine if disparities exist.</li> <li>· <b>HES:</b> Please submit: (1) Student discipline data reviewed; (2) a narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities; and (3) a list of identified disproportionalities.</li> </ul> <p><b>C - Corrective actions.</b> Please clarify the corrective actions, if any, that HES is taking to address any significant disproportionalities.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	The district is not yet able to show compliance with any part of the Three-Part Test for either the high school or the junior high school, for the following reasons.

			<ul style="list-style-type: none"> <li>• Colville High School: <ul style="list-style-type: none"> <li>○ Part 1: Noncompliant. Girls are underrepresented by 31 opportunities, but the average team size is less than that (13).</li> <li>○ Part 2: Noncompliant. Nothing listed.</li> <li>○ Part 3: Noncompliant, because the district did not properly analyze the feasibility of adding the top five requested sports by girls. (The exact analytic framework to use was provided to the athletic director in March.)</li> </ul> </li> <li>• Colville Junior High School: <ul style="list-style-type: none"> <li>○ Part 1: Noncompliant. Boys are underrepresented by 24 opportunities, but the average team size is less than that (10).</li> <li>○ Part 2: Noncompliant. Only added baseball for boys within last 5 years.</li> <li>○ Part 3: Noncompliant because the district did not demonstrate that it analyzed top five requested sports by boys (per the survey) or that it considered the proper questions when determining whether it is feasible to add any of these.</li> </ul> </li> </ul>
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cc:

Randy Cloke, CPR Contact, Colville School District

Heather Judd, Fiscal Contact, Colville School District

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** pete.lewis@colsd.org  
**CC:** rcloke@colsd.org;heather.judd@colsd.org; Timothy.McNeely@k12.wa.us;  
timothy.mcneely@k12.wa.us  
**Subject:** Final Approval for Colville School District for Consolidated Program Review (CPR)  
2018-19  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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9/18/2020

TO: Pete Lewis, Superintendent  
Colville School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2018-19

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/16/2020- is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

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CC:

Randy Cloke, CPR Contact, Colville School District

Heather Judd, Fiscal Contact, Colville School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction



## Review Scheduled

**From:** timothy.mcneely@k12.wa.us

**To:** tom.rockefeller@mead354.org

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Mead School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Tom Rockefeller, Superintendent  
Mead School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/16/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the review date indicated (1/16/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

#### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <http://www.k12.wa.us/ConsolidatedReview/>.

#### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

#### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us  
**To:** shawn.woodward@mead354.org  
[rob.haugen@mead354.org](mailto:rob.haugen@mead354.org); [cherie.eggleston@mead354.org](mailto:cherie.eggleston@mead354.org);  
**CC:** [jared.hoadley@mead354.org](mailto:jared.hoadley@mead354.org); mat.knott@mead354.org; Timothy.McNeely@k12.wa.us;  
haley.lowe@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - Mead School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/17/2020

TO: Shawn Woodward, Superintendent  
Mead School District

FROM: Gayle Pauley, Assistant Superintendent  
Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and

program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
7. Title III/TBIP	Mead has an exemplary EL program, and the care of students in evidence at every level of instruction is excellent. The centralized system for monitoring exited students and tracking referrals is sure to help vulnerable students move on toward graduation.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	<p>6.1: LEA is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field or out-of-endorsement have been approved for the placement.</p> <p>6.3: District is encouraged to have copies of high school diploma (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
11. Highly Capable	Please schedule the Highly Capable Board Policy for review and revision. The provisions passed in 2017 and 2018 sessions are to be included in Board Policy and reflected in the procedures. Policy linked on the district's website is not current (2010) and should be reviewed and revised.
12. CTE/Perkins	<p>12.5.D: Recommendation to add signature and date lines to the training plans for conditionally certified instructors. Please use the PESB website link provided on what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a></p>
15. Fiscal	*The time and effort for three employees were dated prior to the end date on the certification. For example, the certification was signed/dated June 7th, but it stated the work was performed through June 14th. We recommend the District ensure the certifications are signed after the work was performed. See OSPI's time and effort bulletin 048-17 attached at 15.3.a for future reference.

**Action Plan(s) Approved**

Program	Number	Description
Title I, Part A	1.1	Ranking and Allocating
Title I, Part A	1.7	LEA Parent Family Engagement Policy
Title I, Part A	1.8	One Percent Parent and Family Engagement Funds
Title I, Part A	1.10	Notification to Parents
Title I, Part A	1.11	Parent and Family Engagement –Required Strategies LEA and Schools
Title I, Part A	1.12	School Parent Family Engagement Policy/Plan
Highly Capable	11.5	Program Services
Highly Capable	11.6	Program Evaluation
Title IV, Part A	18.1	Comprehensive Needs Assessment

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part A	1.3	Supplement, Not Supplant Methodology	Please upload revised SNS methodology with evidence. LEA is partially exempt, only provide methodology for grade span K-6.
Title II, Part A	6.1	Teacher Professional Qualifications	Uploaded Consent Agenda of January 13, 2020. Please upload signed minutes of January 27, 2020 School Board Meeting.
Homeless	10.2	Dispute Resolution	Please provide evidence of updated procedure 3115P regarding disputes, as the procedure included in evidence is outdated and inaccurate.
Homeless	10.3	Transportation	Please provide clarification regarding the communication between districts when a student resides in one district but attends in another. How

			are the transportation arrangements made and how are both districts engaged in the plan? Please provide evidence. (We could not determine that both districts were working together on the transportation plans, based on the forms in evidence.)
Homeless	10.5	Identification of Students	Please provide two or three housing questionnaires currently in use to provide evidence that the forms are distributed, collected, etc. to identify students. We cannot accept blank samples as valid evidence.
Homeless	10.10	Posting of Rights and Parent Information	Please provide documentation of the locations of posters hung in district buildings as well as in the community. (A list with locations will suffice.)  Provide evidence of the NCHE parent brochure to be readily available in all schools in the district.
Highly Capable	11.1	Annual Public Announcement of ID Activity	Please upload current announcement for major identification activity.
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	D. Please provide Program Evaluations for Business and Marketing, Family and Consumer Science, Health Science, Skilled and Technical Sciences.
Civil Rights	14.11	Annual Athletic Evaluation	<b>14.11.A:</b> For Item 14.11.A, an LEA needs to provide a description of a process by which, at each building that offers athletics (middle school and high school), the LEA annually evaluates the girls' and boys' athletic programs using each of the required factors. The required factors include: Accommodation of interests and abilities (already addressed via Item 14.10); Coaching and tutoring; Equipment and supplies; Scheduling; Facilities; Medical services and training; Publicity and awards; and Travel and per diem.  Please further describe the LEA's process for annually evaluating the girls' and boys' athletic programs at each building that offers athletics, considering each of the required factors. Please include: information about when the evaluation is conducted, how data is

			<p>collected on each required factor, and how the LEA identifies whether disparities exist.</p> <p><b>14.11.B:</b> For Item 14.11.B, an LEA needs to upload evidence demonstrating that, at each building that offers athletics, the LEA performs the annual evaluation described in response to Item 14.11.B.</p> <p>Please upload team worksheets (or whatever equivalent report the LEA is using to collect data from each coach) collected from at least three coaches of girls' teams and three coaches of boys' teams at each middle and high school during the 2018–19 school year.</p> <p><b>14.11.C:</b> It is unclear from the LEA's original response to Item 14.11.C whether the LEA is directly responding to the prompt. If the athletic evaluation for the 2018–19 school year identified disparities that favor one sex at any building, please clearly describe the LEA's plan to address the disparity and evidence of implementation. Evidence can include meeting minutes, emails, reports, etc. If the LEA determines that there are no disparities, then please clearly describe those conclusions and provide supporting evidence.</p> <p><b>14.11.D:</b> LEAs are required to track outside funding, including fundraised money held and distributed by booster clubs. From the LEA's response, it is unclear whether the LEA's current, informal process of school athletic director participation in booster club meetings ensures that the LEA can track the distribution of funds from booster clubs to schools (or their coaches, teams, or athletic programs).</p> <ol style="list-style-type: none"><li>1. Please clarify how the LEA ensures athletic fundraising, donations, and booster club activities do not result in disparities that favor one sex over another. In particular, please clarify whether the LEA and its Title IX Officer are receiving financial reporting from which the LEA can track distribution of funds</li></ol>
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			<p>from booster clubs to schools or their coaches, teams, or athletic programs.</p> <ol style="list-style-type: none"> <li>Please clarify whether and how the LEA, since June of 2015, has implemented additional procedural controls to ensure that internal and outside sources of funding for athletics do not result in disparities that favor one sex over another.</li> <li>Please upload any supporting evidence, such as a booster club and fundraising policy and procedure with explicit consideration of sex equity, the LEA's process to balance funding between girls' and boys' programs, etc.</li> </ol> <p><b>Note:</b> For more guidance, read the "Booster Clubs and Donations" section of OSPI's <a href="#">Equity in School Athletic Programs</a> webpage.</p>
Fiscal	15.2	Accounts Payable Charges	Waiting on additional support for a few A/P transactions relating to bid documentation and inventory records. Please provide in follow-up.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Homeless	10.1	LEA Policy	<p>Please update the district policy 3115 and procedure 3115P. Both documents included in evidence are very outdated and inaccurate per reauthorization. (The most current WSSDA sample policy 3115 was issued 7/19.)</p> <p>Please attached a copy of the district's new policy and procedure along with dates for board action for review/adoption.</p>
CTE/Perkins	12.2	State CTE Approval/Frameworks	B. Please provide current year list of all CTE courses offered by program area, with evidence of approval, and identification of any courses

			<p>offered as state and/or local equivalencies identifying the type of academic credit offered.</p> <p>Mead is Group 3 with Business and Marketing Program Approval was to be done in 2019. There are currently no Business and Marketing courses approved. It remained in Program Review Created status since 4/15/19. These programs re-approvals should be a high priority. If you submit the course approvals for review, they may be reviewed and approved in order for the district to claim CTE funds.</p> <p>Please provide current Program Approval Signature Pages.</p> <p>C. Please provide approved updated framework for each program area.</p>
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	<p>A. Please provide signed current year Program of Study Assurances Checklist form. See uploaded document in Program Monitor.</p> <p>C. Please provide the Program Area: STEM Approval Signature Page. This will have the courses, CIP Codes, Delivery Method, Hours of Instruction, and CTSO. Required to have signatures and dates for: CTE Director, Advisory Committee Chair, and Superintendent.</p> <p>Or, provide current Program of Study for Engineering. The one submitted is not current. CIP Code: 149991 -- Engineering Design I is not approved.</p>
Civil Rights	14.2	Nondiscrimination Statement	<p><b>14.2.B &amp; 14.2.D:</b> The uploaded examples of the LEA's newsletter, annual notification, and job posting include nondiscrimination statements that lack the office address for the LEA's Civil Rights/Section 504/Title IX Compliance Coordinator. Please upload either:</p> <ol style="list-style-type: none"> <li>1. Evidence (such as screenshots, URLs, or clear page number references) that the current version of the LEA's newsletter,</li> </ol>

			<p>annual notification, and job postings include the office address in the nondiscrimination statement; <i>or</i></p> <ol style="list-style-type: none"> <li>2. Evidence (such as an email) that the LEA has notified key staff at each building with specific instructions to including the office address in the nondiscrimination statement included in all LEA or building publications that are widely distributed on an annual or other periodic basis; <i>and</i></li> <li>3. A proposed action plan describing how the LEA will ensure that its complete nondiscrimination statement is included in all LEA and building publications that are widely distributed on an annual or other periodic basis to students, parents, participants, applicants, employees, or other stakeholders.</li> </ol> <p>If proposing a plan, please specifically identify any other publications that will be updated (including, at a minimum: announcements; brochures; calendars; course catalogs; district web sites and other digital publications; FAQs; flyers; job announcements and employment applications; newsletters; employee and student handbooks; and ALE and CTE publications, announcements, and student recruitment materials), when each will be updated or replaced, and who will be responsible for each step of the plan.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p><b>14.3.A:</b> Please revise the LEA's nondiscrimination procedure for students (3210P) so that it does not require signed complaints. When uploading the revised procedure, please also indicate whether the LEA's board will need to adopt the revised procedure, and if so, when that will occur.</p>

			<p><b>14.3.B:</b> Please revise the LEA's nondiscrimination procedure for employees (5010P) so that it does not require signed complaints and current process for complaints to OSPI. When uploading the revised procedure, please also indicate whether the LEA's board will need to adopt the revised procedure, and if so, when that will occur.</p> <p><b>14.3.H:</b> From the uploaded evidence, OSPI is not able to confirm that the LEA is ensuring that all certificated and classroom personnel are receiving training on state civil rights laws. Please upload evidence of the following:</p> <ol style="list-style-type: none"><li>1. Training materials or a summary of topics included in the training, including at a minimum the following: (a) protected classes under Washington state law, (b) forms of discrimination, (c) recognizing different forms of discrimination, (d) how employee must report and respond to discrimination, and (e) the LEA's discrimination complaint procedures (3210P and 5010P); <i>and</i></li><li>2. Sign-in sheets documenting attendance or other attestation that all administrators and certificated and classroom personnel have received the training.</li><li>3. <i>Or</i>, if the LEA is not currently providing compliant training, please upload a proposed action plan for training all administrators and certificated and classroom personnel regarding Washington's civil rights laws, employee responsibilities to report and respond to discrimination, and the LEA's discrimination complaint procedures.</li></ol> <p>If proposing an action plan, please include enough detail for OSPI to confirm</p>
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			<p>that the plan, if executed, will ensure that the LEA meets its training obligations. Please also describe: (a) the date(s) the training(s) will occur; (b) how the LEA will ensure all administrators and certificated and classroom personnel receive the training (<i>e.g., sign-in sheets, follow-up with employees who miss the training</i>); (c) An outline of what subject matter will be included in the training; and (d) Which employee will be responsible to provide the training and carry out this action plan. If the LEA is not proposing to complete its training before the end of this term, please explain.</p> <p><b>Note:</b> OSPI offers a <a href="#">sample PowerPoint training slide deck (PPTX)</a>.</p>
Civil Rights	14.4	Section 504	<p><b>14.4.B:</b> The LEA provided an example of a manifestation determination form on which team members checked a box indicating that the team determined that the underlying student conduct “was not caused by disability (there is no cause and effect relationship)”. This is narrower than the permissible standard, which is whether “the conduct in question was caused by, or had a direct and substantial relationship to, the student’s disability” (See OSPI's <a href="#">2019 discipline guidelines (PDF)</a>).</p> <p>The LEA’s manifestation determination form also does not prompt teams to document their answers to the required question of whether “the conduct in question was the direct result of the school district’s failure to implement the IEP or Section 504 plan.”</p> <p>To move Item 14.4.B into compliance, please upload evidence that the LEA has revised its process for ensuring that its schools conduct compliant manifestation determinations when required for Section 504-eligible students. Please include: (a) a description of the LEA’s</p>

			<p>manifestation determination process, (b) any manifestation determination form the LEA uses, and (c) evidence that the LEA has ensured that school personnel are using the revised process and forms.</p> <p><b>Note:</b> OSPI provides a variety of <a href="#">sample Section 504 forms</a> in English and Spanish on its Section 504 resource web page, including a <a href="#">manifestation determination form (DOCX)</a>.</p> <p><b>14.4.C:</b> The LEA uploaded several examples of documents (such as a "Section 504 Plan" and "Section 504 Team Meeting Summary") that indicate that the LEA determines a student's qualification under Section 504 based on: (1) whether the student has an impairment that substantially limits one or more major life activities, and also (2) whether the impairment "substantially and negatively impacts the child's education." It is unclear from this language whether the LEA is using the necessary eligibility standard.</p> <p>Please upload a narrative explaining the process by which the LEA determines whether a student with a disability that substantially limits one or more major life activities needs accommodations, aids, or services, being sure to clarify what role the two above-noted questions play in that process.</p>
Civil Rights	14.5	Interpretation and Translation Services	<p><b>14.5.B:</b> It is unclear whether the LEA is providing interpretation and translation services to communicate the full scope of vital information with LEP parents. Please clarify the LEA's definition of vital information and vital documents.</p> <p><b>14.5.C:</b> Please further clarify the LEA's proposed action plan for ensuring that all of its spoken-language interpreters or translators are qualified and competent to provide interpretation or</p>

			<p>translation services. Please further describe the proposed training, also clarifying:</p> <ol style="list-style-type: none"> <li>1. When the LEA will provide the training to all current and future employees in the buildings and the district office who provide interpretation or translation services;</li> <li>2. How the LEA will ensure all necessary persons receive the training before the next school year (<i>e.g., sign-in sheets, follow-up with staff who miss the training</i>); and</li> <li>3. Who is responsible to provide the training, and to ensure completion of the action plan?</li> </ol>
Civil Rights	14.8	Course and Program Enrollment	<p><b>14.8.A:</b> The LEA has indicated that it is working on further developing the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address disproportionalities based on sex, race/ethnicity, EL status, special education status, and Section 504 status. Please upload a more detailed description of that revised process, being sure to include at least the following details:</p> <ol style="list-style-type: none"> <li>1. When does the review occur? (<i>Year end? End of each term?</i>)</li> <li>2. Who gathers and reports proportionality data to the review team(s)? Who analyzes disproportionality reports to determine why disproportionalities exist, and to create plans to respond to those identified disproportionalities? Who maintains the record of each review?</li> <li>3. How are the reviews documented? (<i>What is the format of the proportionality reports provided to the team(s)? How is the LEA preserving its analysis of the</i></li> </ol>

			<p><i>reports? Its plans to respond to the identified disproportionalities?)</i></p> <ol style="list-style-type: none"> <li>4. Which courses and programs are reviewed at/from each building? (<i>All courses and programs in which only some students participate. Secondary level examples: Honors, AP, CTE, dual credit, specialized PE, pathway, and other specialized courses; Highly Capable (HC), online, and other specialized programs. For elementary: HC.</i>)</li> <li>5. How does the LEA or building determine whether disproportionalities exist?</li> </ol> <p><b>Note:</b> The LEA previously uploaded examples of school-specific review processes. If the LEA intends to maintain school-specific processes, rather than one unified process for all schools, please remember to upload a revised process description (and any other evidence required for Item 14.8) for each of two elementary schools, two middle/junior high schools, two high schools, and two online or ALE programs (where applicable).</p> <p><b>14.8.B:</b> Please upload evidence demonstrating that the LEA has implemented the revised process described in response to Item 14.8.A, completing a compliant review for the 2018–19 or 2019–20 school year. Please include, at a minimum, evidence of the following:</p> <ol style="list-style-type: none"> <li>1. The course and program enrollment data reviewed by the team(s) (<i>e.g., Course and Program worksheets or other proportionality report</i>);</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building review team analyzed the above data to identify disproportionalities; <i>and</i></li> </ol>
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			<p>3. A list of all the identified disproportionalities.</p> <p><b>Note:</b> It is unclear whether the LEA's previously uploaded documents are a comprehensive list of all identified disproportionalities. The LEA also has not specifically identified the amount of each disproportionality. Please be sure that the LEA's revised review process (and its response to Item 14.8.B) specifically identifies and calculates the amount of each identified disproportionality.</p> <p>LEAs using OSPI's sample <a href="#">Course and Program Enrollment Data Worksheet (XLS)</a> (or an equivalent) can upload the completed worksheets to demonstrate the evidence sought by <i>all three of Items 14.8.B.1-3</i>.</p> <p><b>14.8.C:</b> For each disproportionality identified in the LEA's response to Item 14.8.B, please provide evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (<i>i.e., root cause analysis</i>).</li> <li>2. The LEA or building's plan to address each disproportionality to ensure it is not the result of discrimination (<i>e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling</i>).</li> </ol> <p><b>Note:</b> Please be sure that the LEA's revised review process (and its response to Item 14.8.C) documents individual analysis of each disproportionality in a manner that permits the LEA's future review team(s) (and OSPI): (a) to confirm that a compliant process has been</p>
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			followed, and (b) to gauge the relative success of any initiatives intended to address disproportionalities.
Civil Rights	14.9	Student Discipline	<p><b>14.9.A:</b> The LEA has indicated that it is working on further developing the process the LEA uses to annually review disaggregated student discipline data at each building to identify and address disproportionalities based on sex, race/ethnicity, EL status, special education status, and Section 504 status. Please upload a more detailed description of that revised process, being sure to include at least the following details:</p> <ol style="list-style-type: none"> <li>1. When does the review occur? (<i>Year end? End of each term?</i>)</li> <li>2. Who gathers and reports proportionality data to the review team(s)? Who analyzes disproportionality reports to determine why disproportionalities exist, and to create plans to respond to those identified disproportionalities? Who maintains the record of each review?</li> <li>3. How are the reviews documented? (<i>What is the format of the proportionality reports provided to the team(s)? How is the LEA preserving its analysis of the reports? Its plans to respond to the identified disproportionalities?</i>)</li> <li>4. Which data is reviewed at/from each building?</li> <li>5. How does the LEA or building determine whether disproportionalities exist?</li> </ol> <p><b>Note:</b> The LEA previously uploaded examples of school-specific review processes. If the LEA intends to maintain school-specific processes, rather than one unified process for all schools, please remember to upload a revised process description for each of two elementary schools, two middle/junior high schools, two high schools,</p>

			<p>and two online or ALE programs (where applicable).</p> <p><b>14.9.B:</b> Please upload evidence demonstrating that the LEA has implemented the revised process described in response to Item 14.9.A, completing a compliant review for the 2018–19 or 2019–20 school year. Please include, at a minimum, evidence of the following:</p> <ol style="list-style-type: none"> <li>1. The student discipline data reviewed by the team(s);</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building review team(s) analyzed the data to identify disproportionalities; <i>and</i></li> <li>3. A list of all the identified disproportionalities.</li> </ol> <p><b>14.9.C:</b> For each disproportionality identified in the LEA's response to Item 14.9.B, please provide evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. Evidence must include the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (<i>i.e., root cause analysis</i>).</li> <li>2. The LEA or building's plan to address each disproportionality to ensure it is not the result of discrimination (<i>e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities</i>).</li> </ol> <p><b>Note:</b> Please be sure that the LEA's revised review process (and its response to Item 14.9.C) documents individual analysis of each</p>
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			disproportionality in a manner that permits the LEA's future review team(s) (and OSPI): (a) to confirm that a compliant process has been followed, and (b) to gauge the relative success of any initiatives intended to address disproportionalities.
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p><b>14.10.A:</b> Please upload evidence confirming what student athletic interest survey questions were last used at each school with interscholastic athletics, and what date the survey was administered at each school.</p> <p><b>14.10.B:</b> Please separately upload survey results for each building, with student responses disaggregated by sex. LEAs may use the <a href="#">sample summary worksheet (DOCX)</a>, or an equivalent that includes, at a minimum:</p> <ol style="list-style-type: none"> <li>1. The number of students surveyed.</li> <li>2. The number of students enrolled (<i>i.e.</i>, <i>eligible to take the survey</i>).</li> <li>3. The top five sports requested, including the number of students who expressed interest in each sport.</li> <li>4. The top reasons for non-participation.</li> </ol> <p><b>14.10.C:</b> Please upload completed Three-Part Test analysis for each building, using the OSPI's <a href="#">Athletic Opportunities Tool (ZIP)</a> (AOT). The LEA previously uploaded incomplete AOTs.</p>
Fiscal	15.3	Payroll Charges	Two employees were charged to multiple programs, but used a semi-annual time and effort certification instead of a monthly time and effort certification. These employees did not work in a schoolwide building. Please submit a corrective action plan to explain how the District will correct this issue moving forward.

If you have any questions or concerns about the information provided in this report or if you need

further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Rob Haugen, CPR Contact, Mead School District

Cherie Eggleston, CPR Contact, Mead School District

Jared Hoadley, Civil Rights Contact, Mead School District

Mat Knott, Fiscal Contact, Mead School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us

**To:** shawn.woodward@mead354.org

**CC:** [rob.haugen@mead354.org](mailto:rob.haugen@mead354.org); [cherie.eggleston@mead354.org](mailto:cherie.eggleston@mead354.org);  
[jared.hoadley@mead354.org](mailto:jared.hoadley@mead354.org); [mat.knott@mead354.org](mailto:mat.knott@mead354.org);  
[timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)

**Subject:** 2018-19 Mead School District Review Needs Work

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/14/2021

TO: Shawn Woodward, Superintendent  
Mead School District

FROM: Timothy McNeely, Team Lead

RE: 2018-19 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is February 26, 2021.**

**Evidence Needed**

Program	Number	Description	Evidence
Homeless	10.10	Posting of Rights and Parent Information	Provide a copy of the NCHE parent brochure to be readily available in all schools in the district. "What You Need to Know to Help Your Child in School." (The document included in evidence is not the document requested). Thank you
Fiscal	15.2	Accounts Payable Charges	Please provide the support for any bids obtained for the Perkins transaction selected for review relating to the 61 iMac computers purchased for Mead and Mt Spokane.  Also, thank you for providing the sole source justification for the payment to Paradox charged to Title II. Was a sole source justification prepared prior to the purchase being made?

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
CTE/Perkins	12.2	State CTE Approval/Frameworks	C. Thank you for submitting the Internal Marketing and Social Media Marketing frameworks under the Business and Marketing Program Area.  Please provide approved updated framework for each program area, excluding Business and Marketing.
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	D. Thank you for submitting the CTE Program Evaluation for STEM.  Please provide Program Evaluations for Business and Marketing, Family and Consumer Science, Health Science, Skilled and Technical Sciences.

CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	A. Please provide signed current year Program of Study Assurances Checklist form.
Civil Rights	14.5	Interpretation and Translation Services	<p><b>14.5.B:</b> When an LEA provides vital information to parents, whether orally or in writing, the LEA must ensure it provides that information to parents in a language they understand. The district’s definition of vital information (information about “any safety, health, or welfare-related emergency that requires district-wide communication”) is more limited than state and federal requirements. (More details can be found on OSPI’s <a href="#">Interpretation and Translation</a> webpage for districts, under the subtitle “What types of information must be translated?”)</p> <p>Moving forward, please upload a description of the district’s plan for ensuring that the district communicates vital information with LEP parents, being sure to include the following details:</p> <ol style="list-style-type: none"> <li>1. How the district defines vital information and documents that must be shared with LEP parents, including a list of vital documents and of subject matter that qualifies as vital information.</li> <li>2. How the district decides it will need to communicate vital information using interpretation services.</li> <li>3. How the district decides it will need to communicate vital information using translation services.</li> <li>4. How the district decides whether to translate vital documents into a particular language, such as Marshallese, and if not, district’s plan</li> </ol>



			<p>for communicating vital information into that language.</p> <p>5. How the district is ensuring that employees are familiar with the district's plan.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p><b>14.10.C:</b> The district uploaded its action plan describing how each high school athletic program is taking steps to effectively accommodate the interests and abilities of the underrepresented sex, as demonstrated by the student athletic interest survey. Please also upload the district's action plan describing how Northwood MS will effectively accommodate the interests and abilities of girls (indicated to be the underrepresented sex).</p>

cc:

Rob Haugen, CPR Contact, Mead School District

Cherie Eggleston, CPR Contact, Mead School District

Jared Hoadley, Civil Rights Contact, Mead School District

Mat Knott, Fiscal Contact, Mead School District

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us

**To:** shawn.woodward@mead354.org

**CC:** [rob.haugen@mead354.org](mailto:rob.haugen@mead354.org); [cherie.eggleston@mead354.org](mailto:cherie.eggleston@mead354.org);  
[jared.hoadley@mead354.org](mailto:jared.hoadley@mead354.org); [mat.knott@mead354.org](mailto:mat.knott@mead354.org);  
[Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)

**Subject:** Final Approval for Mead School District for Consolidated Program Review (CPR) 2019-20

**Attachment:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/17/2021

TO: Shawn Woodward, Superintendent  
Mead School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/16/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

--

cc:

Rob Haugen, CPR Contact, Mead School District

Cherie Eggleston, CPR Contact, Mead School District

Jared Hoadley, Civil Rights Contact, Mead School District

Mat Knott, Fiscal Contact, Mead School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us  
**To:** levans@nkschools.org  
**CC:** kkinzer@nkschools.org; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - North Kitsap School District  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Laurynn Evans, Superintendent  
North Kitsap School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/16/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the review date indicated (1/16/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further

evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Kimberly Kinzer, Executive Director of Teaching and Learning, North Kitsap School District

## Follow-up Report to District

**From:** Timothy.McNeely@k12.wa.us

**To:** levans@nkschools.org

**CC:** [kkinzer@nkschools.org](mailto:kkinzer@nkschools.org); [jrhoads@nkschools.org](mailto:jrhoads@nkschools.org); [rdavenport@nkschools.org](mailto:rdavenport@nkschools.org); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us); [haley.lowe@k12.wa.us](mailto:haley.lowe@k12.wa.us)

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - North Kitsap School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/17/2020

TO: Laurynn Evans, Superintendent  
North Kitsap School District

FROM: Gayle Pauley, Assistant Superintendent  
Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/16/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/1/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and

program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	<p>6.1: LEA is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field or out-of-endorsement have been approved for the placement.</p> <p>Item 6.3: District is encouraged to have copies of high school diploma (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
12. CTE/Perkins	<p>1. It is recommended that your meeting minutes format includes the date of the previous meeting in the approval of them.</p> <p>2. Please use the PESB website link provided on what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a></p>
14. Civil Rights	<p><b>14.1: Compliance Coordinators.</b> The district is encouraged to review all publications (online and hard copy) that contain its nondiscrimination statement to ensure that Craig Barry is the only Title IX Officer listed.</p> <p><b>14.2: Nondiscrimination Statement.</b> All versions of the nondiscrimination statement (online and hard copy) should include full contact information for each compliance coordinator (i.e., name or title, phone number, email address, and mailing address).</p> <p><b>14.3: Complaint Procedures.</b> Consider updating the sexual harassment complaint procedure for students so that it contains the name or title and contact information for the Title IX Officer, instead of "[insert name of appropriate district employee]". Consider using OSPI's sample handbook language in the student and employee handbooks, available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> (scroll to Item 14.3, "Sample Student Handbook Language"). OSPI has developed a model civil rights training (i.e., a PowerPoint slide deck and talking points designed to last approximately 30 minutes), which districts may use to fulfill the employee training requirement. It is available on our CPR webpage, here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>, scroll to Item 14.3 and click on "OSPI Sample Staff Training Slide Deck").</p> <p><b>14.4: Section 504.</b> If it hasn't already done so, the district is encouraged to fully transition to the newer notice of parent rights/procedural safeguards found on our</p>



	<p>CPR webpage. When writing Section 504 accommodations, the district is encouraged to be as specific as possible, and to be sure to define general terms, such as "extra time" or "preferential seating." Additionally, the district should ensure that it is not making predeterminations about students' eligibility under Section 504--verbiage like "automatically qualifies" should be avoided, since Section 504 requires districts to fully evaluate a student for eligibility before making such decisions.</p> <p><b>14.11: Annual Athletics Evaluation.</b> The district is encouraged not to count activities such as cheer, dance, drill team, debate, band, and drama as athletic participation opportunities for purposes of tracking interests and abilities on page 1 of the building level worksheet. This is because to date, none of these activities has been included by the U.S. Department of Education as athletic participation opportunities under Title IX. For guidance on what counts as an athletic participation opportunity under Title IX, please review: <a href="https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.pdf">https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.pdf</a>. The district is encouraged to keep more specific records to track its outside sources of athletic funding, so that it is clear where the money is being obtained and spent. For example, just looking at the spreadsheet, it isn't clear whether some funds are benefiting the boys, the girls, or both programs (i.e., "State Competition \$450", or "KHS Athletics \$3933.45"). It is also unclear whether team fundraisers are being included in the spreadsheet (and they should be). Careful monitoring of how this money is spent will help ensure that it is not resulting in inequitable benefits to one sex's program over the other.</p>
15. Fiscal	<p>Purchasing Policy 6220 needs threshold updating. WSSDA's original template for federal procurement of Goods listed incorrect thresholds. The District must use more restrictive \$75,000 state threshold instead of \$250,000 federal threshold. Bulletin 081-18 has been uploaded under 15.2 on 120319.</p> <p>Purchasing, Item 4: Unfortunately, the 09/27/17 email was generic and was not a prior approval specific to the registration. Based on the District's 15_2_15.2 A Accounts Payable Charges – “They approve and review all expenditures before purchasing/payment to ensure they are allowable per the above cost principles and the grant agreement.”</p> <p>Technical Assistance: The District should ensure there is clear documentation approving a particular purchase prior to the purchase.</p> <p>Providing food for a meeting using federal funds: Uploaded documentation under 15.2 - this does not include Parent and Family Engagement activities under Title I</p> <ul style="list-style-type: none"> <li>• A grantee hosting a meeting or conference may not use grant funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or conference business. <ul style="list-style-type: none"> <li>○ A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed</li> </ul> </li> </ul>

to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.

**Action Plan(s) Approved**

Program	Number	Description
Title I, Part A	1.1	Ranking and Allocating
Title III/TBIP	7.13	TBIP Eligible Exited Students
Civil Rights	14.7	National Origin and Immigration Status (Student Enrollment and Registration)

**Evidence Needed**

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	Please see additional determinations for OTF teachers attached in Program Monitor.  The resolutions of 10/1/19 and 1/1/20 are uploaded and signed.  Please upload signed minutes of 1/1/20 Board minutes when available.
Gun-Free	8.2	Policy	Please provide evidence that this policy has been made available to all stakeholders.
Homeless	10.5	Identification of Students	C & D Please provide further evidence of the following: Are LEA staff provided specific training on the identification and rights of students experiencing homelessness? Are they provided training materials?
Homeless	10.8	Early Childhood	A. & B. Please provide further evidence of the following: Evidence of coordination between the

			<p>LEA's McKinney-Vento program and the LEA's preschool program(s). Evidence may include proof of preschool staff training, copies of homeless education parent resources, completed housing questionnaires.</p> <p>C: Please provide evidence that your child find notice includes language specific to students experiencing homelessness.</p>
Homeless	10.11	Title I Set-Aside	<p>Please provide further information:</p> <p>What are the professional development and outreach funds being used for (from your Title I Application)?</p> <p>How would medical needs be covered if there was a need?</p>
Highly Capable	11.2	Identification Process & Consent	Please clarify: appeal form on website states 10 days to appeal, procedure document says 30-day window.
Highly Capable	11.4	Criteria for Identification	Please clarify with evidence how "computerized assessment produces more valid results than classroom proctoring" as noted in "criteria for ID."
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	<p>B. Please provide current articulation agreements for:</p> <ol style="list-style-type: none"> <li>1. Engineering</li> <li>2. Early Learning</li> <li>3. Financial Planning</li> <li>4. WSL Cooperative Education</li> </ol>
Private Schools	13.1	Consultation	<p>Provide a brief description of the LEA's process to contact and assist private schools in completing their intent to participate in federal programs in the EDS tool. Also, provide a brief description of the initial and ongoing consultation process, and include evidence such as letters, agendas, meeting notes, sign-in sheets, etc.</p> <p>This is for participation in other federal programs, not special education.</p>

Private Schools	13.2	Complaint Process	Incorrect version of the complaint procedures are uploaded. Please provide the 2019 version and an assurance statement that the most current version is reviewed with the private schools.
Private Schools	13.3	Professional Development	Please provide actual evidence that the Private school teachers participated in professional development activities based on the private school's plans (e.g., contracts, registrations, sign-in sheets).
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	H: Employee Training. Please submit an action plan describing how the district will document employees' attendance/completion of the training and the date by which all training will be complete (must be within 2019-20 school year).
Civil Rights	14.11	Annual Athletic Evaluation	<b>C: Action Plans.</b> The athletic evaluation for the 2018–19 school year identified a potential disparity between the NKHS baseball and softball facilities. Please explain what steps the district has put in place to analyze and, if necessary, correct this disparity.  <b>D: Description of Process to Ensure Equity in Athletics Funding.</b> Once the district's procedure for handling and disbursing money raised by team fundraisers is ready, please submit a copy for review.
OSSI	16.2	School Improvement Plans	A – Please provide a short description (250-1000 words) that details the board of directors' feedback and approval process for school improvement plans at their annual meetings.  B – Please provide evidence for some of the evidence-based practices listed in 16.2.B. (There is no school improvement plan for the district's only school identified for Comprehensive support: Pal Program.)  D – Please upload Pal Program's school improvement plan to the OSSI SharePoint site for review.
Title IV, Part A	18.1	Comprehensive Needs Assessment	The US Department of ED has recently clarified that the LEA must complete the needs assessment as required by ESEA Section 4106 in order to receive the allocation. This means it is required regardless of

			<p>whether funds were transferred to another Title program.</p> <p>Please submit some evidence that the district examined needs for improvement of:</p> <ul style="list-style-type: none"> <li>-Access to, and opportunities for, a well-rounded education for all students;</li> <li>-School conditions for student learning in order to create a healthy and safe school environment; and</li> <li>-Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.</li> </ul> <p>Or submit an action plan that you will include these during your next planning period.</p>
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.5	English Language Development Services	<p>Please submit an action plan for ensuring that all English learners receive English language instruction that is designed by qualified staff.</p> <p>Services must support the language domains of Speaking, Listening, Reading, and Writing. Program services for each student must be reasonably calculated to enable students to attain English proficiency within a reasonable length of time.</p>
CTE/Perkins	12.1	Assurances and Plan Approval	B: Please provide the minutes from the School Board meeting in which the Perkins Local Plan was approved.
CTE/Perkins	12.4	Special Populations	<p>C: Please provide CTE Instructor ELL Training Log that has the date and year of the training and the Sign In Sheet.</p> <p>This is the same one provided for GLAD and SIOP where there were no dates or year indicated.</p>

CTE/Perkins	12.6	Leadership, Employment, and Extended Learning Opportunities	<p>B: Please provide a copy of official membership roster, or paid invoices for North Kitsap High School CTSO: FBLA.</p> <p>Please provide a copy of official membership rosters, official charter letter or paid invoices for Kingston High School CTSOs: FBLA, DECA, FFA (Does it offer WCTSMA?) and Kingston Middle School, and Poulsbo Middle Schools as appropriate.</p> <p>Please provide equivalencies for: STS, Recording Arts; STS, Metal Jewelry; STEM, Engineering; Family &amp; Consumer Science, Culinary Arts; Family &amp; Consumer Science, ASL; Ag Ed and Science, Environmental Science.</p> <p>D: Please provide a current completed NKSD CTE Extended Days 2019-20 verification form.</p>
Civil Rights	14.8	Course and Program Enrollment	<p><b>A: Description of Process.</b> Please supplement the District's current response by clarifying how the district determines whether a disproportionality exists. For example, does the district consider a difference of +/-1% to be a "disproportionality," or is does it use a higher threshold, perhaps +/-5% threshold higher, perhaps around 5%?</p> <p><b>B: Evidence of Implementation.</b></p> <ol style="list-style-type: none"> <li>1. Data: The district needs to submit data samples from two middle schools. Note that the worksheet for MSOP is missing some data and needs to be completed.</li> <li>2. Once the data review sessions occur in January, the district will need to submit a narrative, report, or meeting minutes that demonstrate and explain how the district analyzed its data to identify and determine the cause of any disproportionalities.</li> <li>3. Once the data review sessions occur in January, the district needs to submit a list of any identified disproportionalities in each building.</li> </ol> <p><b>C: Action Plans.</b> Once the data review sessions have occurred in January, and if substantial disproportionalities were identified in any building, provide evidence that demonstrates that the district is addressing them to ensure they are not the result of discrimination. Evidence must include at least the following:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> </ol>

			<p>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling).</p>
Civil Rights	14.9	Student Discipline	<p><b>B:</b> Evidence of implementation. Please submit Poulsbo Middle School's student discipline data, disaggregated by race, sex, EL status, Section 504 status, and special education status. Please submit a narrative, report, or meeting minutes explaining how the district analyzed its data in each building to identify and determine the cause of any substantial disproportionalities that may exist. Please list any substantial disproportionalities that were uncovered.</p> <p><b>C:</b> Disproportionalities and action plans. The plans submitted are quite broad, and it is unclear how they are intended to address each specific disproportionality identified. Please submit the district's plan to address each substantial disproportionality it identified. Make sure that each action plan is specifically targeted at a particular disparity.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p><b>B: Survey results for each building.</b></p> <p>Please provide survey results, disaggregated by sex, for each building offering interscholastic athletics. Consider using OSPI's Survey Results Summary worksheet, available here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx</a>.</p> <p><b>C: Three-Part Test Analysis.</b></p> <p>Once the Three-Part Test Analysis is completed (in early February) for each building offering interscholastic athletics, please upload to the Program Monitor Tool. Download the required worksheet here: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a></p>
Fiscal	15.3	Payroll Charges	<p>1 of the 8 Time &amp; Effort should have been monthly due to state and federal funding, District provided an Annual Certification.</p> <p>Please review Bulletin B048-17 and provide an Action Plan describing the steps the District will take to ensure accurate Time &amp; Effort will be documented.</p>

If you have any questions or concerns about the information provided in this report or if you need

further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Kimberly Kinzer, CPR Contact, North Kitsap School District

Jason Rhoads, CPR Contact, North Kitsap School District

Rachel Davenport, Civil Rights Contact, North Kitsap School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction



**From:** Kasha.Roseta@k12.wa.us

**To:** [levans@nkschools.org](mailto:levans@nkschools.org); [kkinzer@nkschools.org](mailto:kkinzer@nkschools.org); [jrhoads@nkschools.org](mailto:jrhoads@nkschools.org); [rdavenport@nkschools.org](mailto:rdavenport@nkschools.org)

**Subject:** Civil Rights CPR Follow Up Status Update - North Kitsap School District - 2019-2020

**Attachments:** **File**  
[20.03.02 Items Needing Additional Work NKSD.pdf](#)

3/2/2020

Hello all,

Thank you for submitting additional evidence during the follow-up period immediately after your review. Some progress was made, which is excellent to see. There are still 4 items that require additional follow up. The attached status update document will summarize those items and the actions required, and the same information can now be found in the Program Monitor Tool.

Technically, OSPI has until 3/15/20 to provide you with updated determinations and follow-up actions required, but I like to give districts an early opportunity to correct things as much as I can.

So, to that end, please take a look at the attached document and if you have any additional evidence to submit before the 3/15/20 deadline, you may email it to me as a clearly-labeled attachment (e.g., 14.1.B, Title IX Self-Training) and I will review it, upload it to the Tool for you, and then update my determination. I

Thank you, and as usual, I am more than happy to answer any questions you may have.

Best,

Kasha

[Click Here to log into the Consolidated Program Review application.](#)

## Needs Work

**From:** Timothy.McNeely@k12.wa.us  
**To:** levans@nkschools.org  
**CC:** [kkinzer@nkschools.org](mailto:kkinzer@nkschools.org); [jrhoads@nkschools.org](mailto:jrhoads@nkschools.org); [rdavenport@nkschools.org](mailto:rdavenport@nkschools.org); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** 2019-2020 North Kitsap School District Review Needs Work  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/14/2021

TO: Laurynn Evans, Superintendent  
North Kitsap School District

FROM: Timothy McNeely, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is February 26, 2021.**

**Noncompliant Item(s)**

<b>Program</b>	<b>Number</b>	<b>Description</b>	<b>Actions Required</b>
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	B: Please provide a copy of official membership rosters, official charter letter or paid invoices for Kingston High School CTSOs: DECA, FFA (Does it offer WCTSMA?) and Kingston Middle School, and Poulsbo Middle Schools as appropriate, including FBLA or WCTSMA.  Please provide equivalencies for: STS, Recording Arts; STS, Metal Jewelry; STEM, Engineering; Family & Consumer Science, Culinary Arts; Family & Consumer Science, ASL; Ag Ed and Science, Environmental Science.

cc:

Kimberly Kinzer, CPR Contact, North Kitsap School District

Jason Rhoads, CPR Contact, North Kitsap School District

Rachel Davenport, Civil Rights Contact, North Kitsap School District

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** levans@nkschools.org  
**CC:** [kkinzer@nkschools.org](mailto:kkinzer@nkschools.org); [jrhoads@nkschools.org](mailto:jrhoads@nkschools.org); [rdavenport@nkschools.org](mailto:rdavenport@nkschools.org); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** Final Approval for North Kitsap School District for Consolidated Program Review (CPR) 2019-20

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/18/2021

TO: Laurynn Evans, Superintendent  
North Kitsap School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/16/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

--

cc:

Kimberly Kinzer, CPR Contact, North Kitsap School District

Jason Rhoads, CPR Contact, North Kitsap School District

Rachel Davenport, Civil Rights Contact, North Kitsap School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**Review Scheduled**

**From:** timothy.mcneely@k12.wa.us  
**To:** sheak@evsd.org  
**CC:** reillyl@evsd.org; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - East Valley School District (Spokane)  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Kelly Shea, Superintendent  
East Valley School District (Spokane)

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/23/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA)

federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (1/23/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

**Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

**Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

**About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

**Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Lorri Reilly, Director of Teaching and Learning, East Valley School District (Spokane)



**Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us

**To:** sheak@evsd.org

**CC:** reillyl@evsd.org; lydenm@evsd.org; rasmussenn@evsd.org;  
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Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-Up Report - East Valley School District (Spokane)

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/30/2020

TO: Kelly Shea, Superintendent  
East Valley School District (Spokane)

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/23/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/8/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
15. Fiscal	District staff were great to work with. Documentation was submitted timely and staff provided great communication throughout the review.

**Technical Assistance**

Program	Technical Assistance Note
1 . T it l e l, P a r t A	The LEA is encouraged to include a link on your webpage to the NAEP-State Comparisons page as this will be a CPR requirement beginning with 2020-21 reviews: <a href="https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N">https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N</a>
6. Title II, Part A	6.1: LEA is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field or out-of-endorsement have been approved for the placement.  6.3: District is encouraged to have copies of high school diploma (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.
7. Title III/TBIP	7.3-Due to the vulnerability of this group, please review Title III eligible Native American student records quarterly to determine risk. Refer for additional supports if necessary.

	7.13-Due to the vulnerability of this group, please review Title III eligible Native American student records quarterly to determine risk. Refer for additional supports if necessary.
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Moodle. Self-register to open your own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>
15. Fiscal	<p><i>Payroll Charges</i></p> <p>Timesheets and semi-annual certifications should be signed timely after the month or certification period has ended.</p> <p><i>Accounts Payable</i></p> <ul style="list-style-type: none"> <li>-Funds should not obligated to grants before the period of performance begins.</li> <li>-Written prior approval should be obtained before purchases are made.</li> </ul>

**Evidence Needed**

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	Please provide signed School Board Minutes that include the names of the latest list of teachers out of endorsement.
Title III/TBIP	7.5	English Language Development Services	<p>7.5.A Please provide evidence of school board approval of an allowable program model in Washington and approved within the last two calendar years.</p> <p>7.5.D For students listed as having receive 0 minutes of service, please provide evidence that they were no longer eligible for services.</p> <p>7.5.E Please provide evidence that student 70744 received language services by a qualified teacher. For student 40123, please submit a copy of the waiver of EL services.</p>

Title III/TBIP	7.7	Professional Development	<p>7.7 Please submit agendas for each session.</p> <p>Please provide evidence that professional development is of sufficient intensity and duration to have a positive and lasting impact on the teachers' performance in the classroom.</p> <p>- Please include how GLAD-trained teachers will receive ongoing support for implementation.</p>
Title III/TBIP	7.9	Program Evaluation	<p>7.9 Please provide evidence that the district solicited stakeholder feedback and have made modifications based on that feedback.</p>
Title III/TBIP	7.10	Parent Engagement	<p>7.10 Please submit evidence of family engagement consistent with the plan in the district's Title III grant application. Minimally, this would include comparable attendance at the conferences, extended day activities, and parent involvement activities.</p>
Title III/TBIP	7.12	Bilingual Education	<p>7.12 East Valley's TBIP grant was not approved for a bilingual instructional program. If you have a Dual Language, Late Exit, or Early Exit program, please upload a full description of an allowable program model and evidence of bilingual instruction. If this is not in place, please provide evidence consistent with pa 3 of the TBIP grant.</p>
Homeless	10.3	Transportation	<p>Please provide clarification regarding the process for in-lieu mileage. The information indicates the family cannot be paid for mileage if the child is tardy or if they are picked up early. Please clarify.</p>
Homeless	10.5	Identification of Students	<p>Please show evidence that the district is using an updated housing questionnaire (the one currently being used and shown in evidence is outdated and lacks complete definitions found in the M-V Act.) Also, please update the end of year letter to families to include the full definition of homelessness, not only select examples. Provide an action plan for training all staff annually, rather than every other year.</p>

Homeless	10.6	Enrollment, Intake, and Access	Please provide evidence of the intake form and the process to be used in the district. Intake should include additional prompts for intake/interview, as well as a clear process for referrals for services. The OSPI sample is found on the OSPI website if an example is needed.
Homeless	10.7	Unaccompanied Homeless Youth: Higher Education/FAFSA	Please provide action plan, using the action plan template on the OSPI CPR website, to show how the district will implement the requirements of FAFSA verification and the support of higher education for students experiencing homelessness. (Who will do what, by when.) Immediate timeframe please, as FAFSA window will soon be closing for many students.
Homeless	10.9	Community Collaboration	One of the attached documents includes hand-written notes with reference to providing "by name" lists, and "by name" lists were currently being provided for unaccompanied youth. Please clarify how this information is being shared, to whom, and for what purpose.
Homeless	10.10	Posting of Rights and Parent Information	Please provide required documentation of where posters and other information is posted throughout the community. Provide locations in schools and throughout the community.
Homeless	10.11	Title I Set-Aside	Please provide clarification regarding the FTE of the homeless liaison. The Title I needs assessment indicates the liaison is at 0.2 FTE, however the signed attestation provided in item 10.4 indicates the liaison has a full 1.0 FTE position. Please provide information regarding the discrepancy.
Highly Capable	11.6	Program Evaluation	Please provide data from survey and student achievement data that was reviewed.
Title IV, Part A	18.1	Comprehensive Needs Assessment	The US Department of ED has recently clarified that the LEA must complete the needs assessment as required by ESEA Section 4106 in order to receive the allocation. This means it is required regardless of

			<p>whether funds were transferred to another Title program.</p> <p>Please submit some evidence that the district examined needs for improvement of:</p> <ul style="list-style-type: none"> <li>-Access to, and opportunities for, a well-rounded education for all students;</li> <li>-School conditions for student learning in order to create a healthy and safe school environment; and</li> <li>-Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.</li> </ul> <p>Or submit an action plan that you will include these during your next planning period.</p>
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title I, Part A	1.4	Annual LEA Report Card	1.4.A: Evidence is needed of Report Card dissemination via non-digital means for the larger community. A school board meeting will not suffice as a method to reach the larger community as the majority of community members do not attend school board meetings. The <a href="#">action plan</a> provided is not acceptable as it has a September 2020 completion date. Evidence is needed to show the mailing to district patrons occurred during the 2019-20 school year.
Title I, Part A	1.7	LEA Parent Family Engagement Policy	<p>1.7.B: Evidence needed of a non-digital communication of the parent notification. The email request to buildings to have this information in school newsletters is noted, but the actual school newsletters with the invitation are needed.</p> <p>1.7.B: Received Trentwood newsletter containing information regarding LEA's Title IA Meeting. The newsletter from Trent is not in evidence. An email from Lorri states that this will occur next year so the</p>

			requirement will not be met during the 2019-20 school year.
Title I, Part A	1.8	One Percent Parent and Family Engagement Funds	1.8.C: The comments describe when and how parent feedback is gathered and provided to the LEA. How the LEA incorporates parent feedback into funding decisions is not clear. The action plan is not acceptable as June 2020 is too late to complete this requirement for the 2019-20 school year; by that time the feedback will no longer be actionable for the 2019-20 school year.
Title I, Part A	1.17	Targeted Assistance Program and Identification of Students	<p>1.17.A: It appears that the building's SIP was used as the targeted assistance plan, but the SIP does not clearly identify the six required components. For clarity, it is recommended that the revised document include the six requirements as separate headings to ensure all requirements are included.</p> <p>The <a href="#">action plan</a> cannot be accepted as the 2019-20 plan must be completed. The schoolwide plan scheduled to be completed in August 2020 will be for the 2020-21 school year. The targeted assistance plan for 2019-20 is needed.</p>
Title I, Part A	1.18	Targeted Assistance Program Evaluation	<p>1.18.B: It appears that the most recent version of the annual evaluation was not uploaded. The probable changes section is not completed.</p> <p>The <a href="#">action plan</a> submitted cannot be accepted as "Monday" is not a clear timeline since the document isn't dated. Instead, the completed evaluation will need to be submitted. The action plan will need to address how the building will ensure that the evaluation is completed each year.</p>
LAP	2.1	State Requirements and Best Practices	1.2.B: There is not alignment between the best practices listed in 2.1.A and 2.1.B. For example, Trentwood has Kindergarten Transition listed in 2.1.A, but there is no mention of this best practice in 2.1.B. You may want to consider creating a chart for 2.1.B where the best practices listed in 2.1.A become the

			first column, then add three columns to address (a) frequency/duration, (b) grade level, (c) how focus was determined. This way, the information in the evidence will be consistent.
LAP	2.3	Program Implementation	2.3: Trentwood: Need modifications made to program.
Title III/TBIP	7.1	Identification	7.1 B,C,D,F  There still exists a need for more consistent identification, screening, and notification. At least two students were not identified and served in a timely manner. Please submit an Action Plan in the post-review period. Please include an element of staff training on completing documents accurately and within the required timelines.
Highly Capable	11.2	Identification Process & Consent	District must revise identification procedure to eliminate use of "cut" scores on standardized assessments, and a scoring matrix which combines and weights percentile scores. These are not valid assessment procedures. Please submit revision or detailed action plan.
CTE/Perkins	12.4	Special Populations	A. Please provide CTE Enrollment Report to also include Special Populations.
CTE/Perkins	12.5	Professional Development/CTE Personnel	D. Please provide a written training plan for each conditionally certified instructor.
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	B. Please resubmit the FBLA-PBL two invoices: No.: 97651 for 12 students and No.: 41921 for 42 students without the hashtag in the file naming convention.
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	A. Please provide 2019-2020 Program of Study Assurance Checklist form. Document template has been uploaded.



			<p>B. Please provide current year articulation agreements (signed articulation agreement must match the identified Program of Study in the LEAs Perkins application).</p> <p>LEA provided Spokane Community College or Spokane Falls Community College Program Articulation Agreement for East Valley School District - Business, CIP Code: 52.0201. Renewal 2018-19 (three year rotation). The Agreement not signed or dated.</p> <p>LEA provided out of date articulation agreement with Spokane Community College or Spokane Falls Community College Program Articulation Agreement for East Valley School District - Hotel and Restaurant Management, CIP Code: 52.0904. Renewal 2014-15 (three year rotation).</p> <p>C. Please provide evidence of current courses within the Program of Study identified in the LEA's Perkins application that has been approved by OSPI (e.g. the identified course approvals).</p> <p>LEA to provide for Business and Marketing, Information Technology.</p> <p>LEA indicated a current Program of Study for Hospitality and Tourism. Provide evidence of OSPI approval. The LEA submitted a screen shot of Nutrition and Wellness in Health Science. This does not match.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>F. It appears the district does not have an employee handbook, where LEAs often include this information. Submit evidence that the district has provided information to all staff about the LEA's:</p> <ol style="list-style-type: none"> <li>1. sexual harassment policy and</li> <li>2. discrimination complaint procedures.</li> </ol> <p>District may include the sample language found below in a staff newsletter, provide staff with a hard copy of the sample handbook language, or provide staff with hard copies of the sexual harassment and</p>

			<p>nondiscrimination policies and procedures. The district may also email this information to staff with link or attachments to policies and procedures (Note that it is not acceptable to use email to provide this information to staff, as not all families have access to the internet.)</p> <p>In addition, describe how the district will provide this information annually moving forward.</p> <p><b>Note:</b> Sample handbook language meets requirements to provide both 1) information about sexual harassment and 2) information about the discrimination complaint process. is available at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> under Item #14.3. Sample handbook language includes information about both sexual harassment as well as the discrimination complaint procedures.</p> <p>H. Submit an action plan for training all district administrators and certificated and classroom personnel about the district's discrimination complaint process, incorporating the requirement that employees report and respond to discrimination. The training should include information about Washington's protected classes, forms of discrimination, recognizing different forms of discrimination, how staff must respond to allegations of discrimination, and the district's discrimination complaint procedures (WSSDA's 3210/P and 5010/P or equivalent). The plan should also:</p> <ul style="list-style-type: none"> <li>· include an outline of the training</li> <li>· describe how the district will ensure all administrators and certificated and classroom personnel receive the training</li> <li>· method for documenting staff who take training</li> <li>• identify when the training will take place (as soon as possible, but no later than April 15, 2020), and</li> </ul>
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			<ul style="list-style-type: none"> <li>· identify the employees responsible for providing the training</li> </ul> <p><b>Note:</b> Training should happen as soon as possible, but not later than <b>March 27, 2020</b>.</p> <p>OSPI sample training slides previously provided to District.</p>
Civil Rights	14.8	Course and Program Enrollment	<p>A. Describe the process the LEA uses to annually review disaggregated course and program enrollment data at each building to identify and address disproportionalities based on sex, race, EL status, special education status, and Section 504 status. At a minimum, the description must include:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. Which course and programs are reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p>B. Provide evidence that the above process was implemented in the 2018–19 or 2019–20 school year. At a minimum, include:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, evidence must include:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (reviews of counseling practices, identification and selection of students, recruitment materials and strategies, and course scheduling, etc.).</li> </ol>

			D. If no disproportionalities were identified, describe grounds for N/A determination.
Civil Rights	14.9	Student Discipline	<p>A. Describe the process the LEA uses to review disaggregated student discipline data at each building at least once per year. At a minimum, discipline data reviewed should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions. Discipline data must be disaggregated sex, race, EL status, special education status, and Section 504 status to identify and address disproportionalities. At a minimum, the description of the review process must include:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the reviews.</li> <li>3. How the reviews are documented.</li> <li>4. What data is reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p>B. Provide evidence that the above process was implemented in the 2018–19 or 2019–20 school year. At a minimum, include: Student discipline data reviewed.</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>2. A list of identified disproportionalities.</li> </ol> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, evidence must include:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> </ol>

			<p>2. The LEA or building’s plan to address each disproportionality to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</p> <p>D. If no disproportionalities were identified, describe grounds for N/A determination.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>A. Upload a complete copy of the student athletic interest survey the district uses. In addition, identify the date it was most recently administered.</p> <p>B. Upload the athletic interest survey results for <b>each</b> high school and middle/junior high school selected for review that offers sports. The answers to <b>each survey question</b> must be disaggregated by sex and building.</p> <p>Summary of results should include, at minimum:</p> <ol style="list-style-type: none"> <li>1. The number of students surveyed by gender.</li> <li>2. The number of students enrolled (eligible to take the survey) by gender.</li> <li>3. The top sports requested, including the number of students who expressed interest in each sport for each gender.</li> <li>4. The top reasons for non-participation for each gender</li> </ol> <p>Note: The easiest method meeting 14.10B requirements is to use the "Student Athletic Interest Survey: Results Worksheet (Word)" found under 14.11 located at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>.</p> <p>C. Upload a completed Three-Part Test analysis for <b>each building</b> (use a separate tab at bottom of spreadsheet for each building) using the OSPI’s Athletic Opportunities Tool, located at <a href="https://www.k12.wa.us/policy-funding/equity-and-">https://www.k12.wa.us/policy-funding/equity-and-</a></p>

			<p>civil-rights/consolidated-program-review-civil-rights under 14.10 (Accommodating Student Interests and Abilities).</p> <p><b>Note:</b> Compliance with Three-Part Test will be assessed once "a" and "B" above are submitted.</p> <p>C. Upload a completed Three-Part Test analysis for <b>each building</b> (use a separate tab at bottom of spreadsheet for each building) using the OSPI's Athletic Opportunities Tool, located at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights-under-14.10">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights under 14.10 (Accommodating Student Interests and Abilities)</a>.</p> <p><b>Note:</b> Compliance with Three-Part Test will be assessed once "a" and "B" above are submitted.</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A. Describe the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p>B. Upload evidence that the above process was implemented for the 2018–19 or 2019–2020 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.</p> <p>C. If the athletic evaluation for the 2018–2019 or 2019–2020 school year identified disparities that favor one sex at any building, upload evidence that the LEA or building is taking effective steps to correct the disparity. If no disparities were identified, please describe grounds for N/A determination.</p> <p>D. Describe the LEA's process for ensuring that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another.</p>
Fiscal	15.2	Accounts Payable Charges	<p>One purchase to the Title I grant totaling \$933 was made on 8/13/18 before the grant application was approved on 8/21/18. One purchase to the Title II</p>

			<p>grant totaling \$615 was made on 8/14/18 before the grant application was approved on 10/12/18.</p> <p>Both purchases were outside of the period of performance and would not be allowable to charge to the grants.</p> <p>Please provide an action plan detailing how the district will ensure funds are not spent outside of the period of performance.</p> <p>During review of the transaction for Scholastic Inc. totaling \$11,760, the district did not follow the Small Purchase Procedures to obtain quotes from a reasonable number of qualified sources for purchases of \$10,000-\$75,000.</p> <p>Please provide an action plan detailing how the district will ensure procurement methods will be followed moving forward.</p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Lorri Reilly, CPR Contact, East Valley School District (Spokane)

Maureen Lyden, CPR Contact, East Valley School District (Spokane)

Neale Rasmussen, Fiscal Contact, East Valley School District (Spokane)

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** sheak@evsd.org  
**CC:** reillyl@evsd.org;lydenm@evsd.org;rasmussenn@evsd.org;  
timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 East Valley School District (Spokane) Review Needs Work  
**Attachments:** No attachments found for this message.



**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

1/22/2021

TO: Kelly Shea, Superintendent  
East Valley School District (Spokane)

FROM: Timothy McNeely, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is March 5, 2021.**

**Evidence Needed**

Program	Number	Description	Evidence
Title III/TBIP	7.10	Parent Engagement	7.10 Please submit evidence of family engagement consistent with the plan in the district's Title III grant application. Minimally, this would include comparable



			<p>attendance at the conferences, extended day activities, and parent involvement activities.</p> <p>Please create an action plan that addresses parent engagement at all grade levels. Please describe the locations and nature of engagement activities. Please provide a timeline for when these events will be conducted. Please identify which staff members will be responsible for which tasks in this plan.</p>
Title III/TBIP	7.12	Bilingual Education	<p>7.12 East Valley's TBIP grant was not approved for a bilingual instructional program. If you have a Dual Language, Late Exit, or Early Exit program, please upload a full description of an allowable program model and evidence of bilingual instruction. If this is not in place, please provide evidence consistent with pa 3 of the TBIP grant.</p> <p>If a bilingual program is not provided, please provide evidence for the real and persistent barrier that prevents the district from offering one as required under state law. This evidence should be consistent with the AIP statement in your TBIP grant, pa 3.</p>
Homeless	10.3	Transportation	<p>Please provide clarification regarding the process for in-lieu mileage. The information indicates the family cannot be paid for mileage if the child is tardy or if they are picked up early. Please clarify. Please provide an updated in-lieu form/process. The district cannot discontinue services when "in the best interest of the district" as this would be inconsistent with the requirements of McKinney-Vento. Please revise the in lieu forms/process and provide a copy for review, or use the OSPI form found on the OSPI website and upload a copy with district letterhead, contact information, etc. customized for the district. Make sure the form references the state in lieu rules WAC 392-141-350. Contact Melinda Dyer at OSPI if there are questions.</p>
Homeless	10.5	Identification of Students	<p>Please upload a copy of a revised housing questionnaire. Some of the questions/prompts on the form shown in evidence are not consistent with the language of the federal law. (Check with Melinda Dyer for clarification on</p>

			the section(s) that need editing.) The evidence below does not provide training until the 20-21 school year. Training is to occur during the current school year. Provide evidence or updated training schedule for the current year.
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.5	English Language Development Services	<p>7.5.A Please provide evidence of school board approval of an allowable program model in Washington and approved within the last two calendar years.</p> <p>7.5.D For students listed as having receive 0 minutes of service, please provide evidence that they were no longer eligible for services.</p> <p>7.5.E Please provide evidence that student 70744 received language services by a qualified teacher. For student 40123, please submit a copy of the waiver of EL services.</p> <p>Several Students are described as not receiving the minimum services consistent with the district's civil rights obligations. Please create an action plan to serve all students who qualify for services. The Dear Colleague Letter may be a helpful resource in the creation of this plan. All emerging and progressing level students must receive regular English language development instruction, regardless of school location, Special Needs designation, or staffing challenges.</p>
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	<p>A. Please provide 2019-2020 Program of Study Assurance Checklist with the Minimum Criteria boxes checked and any the Exceeds Minimum Criteria that applies.</p> <p>C. 1. Please provide Course Approval Signature Page for App ID: 23722, Course Title: Foods &amp; Nutrition.</p>

			<p>CIP: 190501 that is signed and dated by: CTE Director, Advisory Committee Chair, Superintendent (or designee).</p> <p>2. Please provide Course Approval Signature Page for App ID: 28674, Business and Marketing, Office User Specialist, CIP Code: 110699 that is signed and dated by: CTE Director, Advisory Committee Chair, Superintendent (or designee).</p> <p>3. Please provide Course Approval Signature Page for App ID: 32276, Business and Marketing, Information Technology, CIP Code: 110699 that is signed and dated by: CTE Director, Advisory Committee Chair, Superintendent (or designee).</p>
Civil Rights	14.8	Course and Program Enrollment	<p>A. Due to COVID-19, this year the focus for 14.8 is ensuring the district has a process in place to meet the requirements of this item, to identify and eliminate discrimination at each school building related to course and program enrollment, regardless of district intent. This means a keen focus on “A” for this item.</p> <p>Provide a detailed description of the process the district uses (detailed sequence of steps the district takes) to gather, review, and address conclusions drawn from that review, for item 14.8. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status at the building level. The review process system should be one that can withstand change(s) in personnel—in other words, be a sustainable system. At a minimum, the description of the review process for 14.8.A. must include:</p> <ul style="list-style-type: none"> <li>· When the review occurs</li> <li>· Who is involved in the review</li> <li>· How the reviews are documented</li> <li>· What data is reviewed</li> </ul>

			<ul style="list-style-type: none"> <li>How the LEA or building determines whether disproportionalities exist</li> </ul>
Civil Rights	14.9	Student Discipline	<p>A. Due to COVID-19, this year the focus for 14.9 is ensuring the district has a <i>processing</i> place to meet the requirements of this item, to identify and eliminate discrimination at each school building related to discipline, regardless of district intent. This means a keen focus on “A” for this item.</p> <p>Provide a detailed description of the <i>process</i> the district uses (detailed sequence of steps the district takes) to gather, review, and address conclusions drawn from that review, for item 14.9. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status <i>at the building level</i>. The review process system should be one that can withstand change(s) in personnel—in other words, be a sustainable system. At a minimum, the description of the review process 14.9.A. must include:</p> <ul style="list-style-type: none"> <li>ü When the review occurs</li> <li>ü Who is involved in the review</li> <li>ü How the reviews are documented</li> <li>ü What data is reviewed</li> <li>ü How the LEA or building determines whether disproportionalities exist</li> </ul>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>A. Upload a complete copy of the student athletic interest survey the district uses. In addition, identify the date it was most recently administered.</p> <p>B. Upload the athletic interest survey results for <i>each</i> high school and middle/junior high school selected for review that offers sports. The answers to <i>each survey question</i> must be disaggregated by sex and building.</p> <p>Summary of results should include, at minimum:</p>

			<p>1. The number of students surveyed by gender.</p> <p>2. The number of students enrolled (eligible to take the survey) by gender.</p> <p>3. The top sports requested, including the number of students who expressed interest in each sport for each gender.</p> <p>4. The top reasons for non-participation for each gender</p> <p>Note: The easiest method meeting 14.10B requirements is to use the "Student Athletic Interest Survey: Results Worksheet (Word)" found under 14.11 located at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>.</p> <p>C. Upload a completed Three-Part Test analysis for <b>each building</b> (use a separate tab at bottom of spreadsheet for each building) using the OSPI's Athletic Opportunities Tool, located at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> under 14.10 (Accommodating Student Interests and Abilities).</p> <p><b>Note:</b> Compliance with Three-Part Test will be assessed once "A" and "B" above are submitted</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A Describe the <i>process</i> the LEA uses annually to evaluate girls' and boys' athletic programs at each building to identify and address disparities based on each required factor. ("A" is description of process, while "B" requires evidence that documents the use of process described for "A.")</p> <p>D. Describe the <i>process</i> the LEA uses to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (What sequential step are taken? How and</p>

			what documentation is kept as evidence this review process is used?)
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CC:

Lorri Reilly, CPR Contact, East Valley School District (Spokane)

Maureen Lyden, CPR Contact, East Valley School District (Spokane)

Neale Rasmussen, Fiscal Contact, East Valley School District (Spokane)

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** sheak@evsd.org  
**CC:** reillyl@evsd.org; lydenm@evsd.org; rasmussenn@evsd.org;  
Timothy.McNeely@k12.wa.us; timothy.mcneely@k12.wa.us  
**Subject:** Final Approval for East Valley School District (Spokane) for Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/29/2021

TO: Kelly Shea, Superintendent  
East Valley School District (Spokane)

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/23/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

--

cc:

Lorri Reilly, CPR Contact, East Valley School District (Spokane)

Maureen Lyden, CPR Contact, East Valley School District (Spokane)

Neale Rasmussen, Fiscal Contact, East Valley School District (Spokane)

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction



## Review Scheduled

**From:** timothy.mcneely@k12.wa.us  
**To:** tames@mlsd.org  
**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Medical Lake School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Timothy D. Ames, Superintendent  
Medical Lake School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/23/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal

programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (1/23/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further

evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** tames@mlsd.org  
**CC:** [cmoss@mlsd.org](mailto:cmoss@mlsd.org); [kheadrick@mlsd.org](mailto:kheadrick@mlsd.org); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** 2019-2020 Medical Lake School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/21/2021

TO: Timothy D. Ames, Superintendent  
Medical Lake School District

FROM: Timothy McNeely, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is March 5, 2021.**

**Evidence Needed**

Program	Number	Description	Evidence
Title III/TBIP	7.4	Staff Qualifications	In the event that your teachers are not fully endorsed by the start of the 2020-2021 school year, please add a section of PD quarterly to your Action Plan. There is still significant concern that Medical Lake does not have enough EL endorsed teachers to meet the minimum civil rights obligations. This is consistent with guidance from the Office of Civil Rights in the Dear Colleague Letter.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.1	Identification	Please complete a detailed Action Plan to address all items in 7.1 and 7.2. Please include persons assigned to each task area, a timeline for completion, documents and a checklist that covers the procedures for enrollment, identification, screening, and parent notification. Please include a plan for internal auditing that you will conduct each year to verify that these protections for families and districts are in place, and a timeline for reporting this progress to the school board.
Title III/TBIP	7.2	Parent Notification	At the time of the third review, newly uploaded documents did not show a pattern of the timely identification, screening, placement for services, and notification of family members.  Please complete a detailed Action Plan to address all items in 7.1 and 7.2. Please include persons assigned to each task area, a timeline for completion, documents and a checklist that covers the procedures for enrollment, identification, screening, and parent notification. Please include a plan for internal auditing that you will conduct each year to verify that these protections for families and districts are in place, and a timeline for reporting this progress to the school board.

Title III/TBIP	7.5	English Language Development Services	<p>The Action Plan submitted does not meet the minimum civil rights obligations. Please review the content of the Dear Colleague Letter and the allowable models for the delivery of services in Washington State. Please create a plan for the delivery of services by an EL or BE endorsed teacher (or a comparable level of PD to that of an endorsement) for all emerging and progressing level students by SSID. Please include schedules for all grade levels.</p> <p>Currently only evidence for two grade levels was submitted, and no teachers or students were identified. The plan to adopt a curriculum is approvable and should be incorporated in the full program Action Plan. Please include a timeline for obtaining school board approval of this plan.</p>
Title III/TBIP	7.9	Program Evaluation	<p>Please submit an Action Plan to solicit stakeholder feedback and incorporate the findings into your program. ESSA requires that programs incorporate parent feedback into their program design. See item F.</p>
Title III/TBIP	7.13	TBIP Eligible Exited Students	<p>The MTSS system lacks a systematic approach to identifying struggling bilingual students who are in need of support. As this is the most vulnerable student demographic in Washington State, please create a plan that monitors all students exited within the last two years, uses risk indicators validated for bilingual students, and offers a menu of language and literacy support that will be made available to exited students who may be struggling to participate meaningfully in the content classrooms. Please identify persons assigned to each task and resources that will be needed. Please include a timeline for reporting this progress to the school board.</p>

cc:

Chad Moss, Fiscal Contact, Medical Lake School District

Kimberly Headrick, CPR Contact, Medical Lake School District

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** tames@mlsd.org  
**CC:** [cmoss@mlsd.org](mailto:cmoss@mlsd.org); [kheadrick@mlsd.org](mailto:kheadrick@mlsd.org); [Timothy.McNeely@k12.wa.us](mailto:Timothy.McNeely@k12.wa.us);  
[timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** Final Approval for Medical Lake School District for Consolidated Program Review (CPR) 2019-20

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/22/2021

TO: Timothy D. Ames, Superintendent  
Medical Lake School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/23/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

--

cc:

Chad Moss, Fiscal Contact, Medical Lake School District

Kimberly Headrick, CPR Contact, Medical Lake School District

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction



## Review Scheduled

**From:** timothy.mcneely@k12.wa.us

**To:** rclark@sequimschools.org

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Sequim School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/5/2019

TO: Robert Clark, Superintendent  
Sequim School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 1/23/2020. You may begin uploading documentation today and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (1/23/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Timothy.McNeely@k12.wa.us

**To:** rclark@sequimschools.org

**CC:** Timothy.McNeely@k12.wa.us; timothy.mcneely@k12.wa.us;  
Gayle.pauley@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us;  
sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us;  
Dierk.Meierbachtol@k12.wa.us; Michaela.Miller@k12.wa.us;  
Rebecca.Wallace@k12.wa.us; isaac.conver@k12.wa.us; Jody.hess@k12.wa.us;  
haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - Sequim School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/30/2020

TO: Robert Clark, Superintendent  
Sequim School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 1/23/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/8/2020.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
11. Highly Capable	District is commended for providing many opportunities for professional learning and collaboration for staff to meet the needs of Highly Capable and high performing students.

**Technical Assistance**

Program	Technical Assistance Note
1. Title I, Part A	Ensure annual parent meeting and notifications occur towards the beginning of the school year in all Title I schools.
6. Title II, Part A	<p>6.1: LEA is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field or out-of-endorsement have been approved for the placement.</p> <p>6.3: District is encouraged to have copies of high school diploma (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
7. Title III/TBIP	Provide professional development to classroom teachers regarding effective instructional strategies for English learners, the English Language Proficiency Standards, and the process of second language acquisition. Include the professional development in the district's TBIP grant application.
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical

	assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Moodle. Self-register to open your own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>
12. CTE/Perkins	Please use the PESB website link below to determine what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a>
14. Civil Rights	<p><b>14.7 National Origin and Immigration Status (Student Enrollment and Registration)</b></p> <p>The district is strongly encouraged to revise its enrollment forms to expand its examples of ways to verify a student's age. Requesting documentation of student age must not be done in a way that discourages a prospective student from enrolling in and attending school based on lack of particular paperwork, or immigration or citizenship status. Alternative documentation should be accepted.</p> <p><b><i>Idea for replacement language:</i></b></p> <p>For verification (or documentation) of age, submit: a religious, hospital, or physician's certificate showing date of birth; an entry in a family bible; an adoption record; an affidavit from a parent; a birth certificate; previously verified school records; etc.)</p>
15. Fiscal	<b>Time and Effort</b> - time and effort for employees working in multiple programs, must be based on actual activity and not just on time budgeted. It is highly unlikely that employees who are not working a fixed schedule (such as classroom teachers or paraprofessionals) are working the same amount on each cost objective each and every day. Please make sure that employees are certifying their time and effort based on actual activity.

**Action Plan(s) Approved**

Program	Number	Description
Title III/TBIP	7.2	Parent Notification

## Evidence Needed

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	<p>Signed School Board minutes need to be uploaded for the following OTF teachers:</p> <p>Michelle Mahitka Steve Mahitka Isaac Rapelje Joseph Sullivan</p>
Homeless	10.3	Transportation	<p>Please provide additional evidence such as written agreements and/or communication between districts to show evidence that the districts are working together to provide services, and that both districts agree on method and parents are aware of process. Situations such as snow days, early release, etc. are planned for.</p> <p>Per telephone conversation with Renee Alcararas on 1/24/20, please submit an action plan for transportation services moving forward. Use the action plan template on the OSPI CPR website.</p>
Homeless	10.5	Identification of Students	<p>Please provide attendance/participation log for staff. (Safe Schools.)</p> <p>Please provide a copy of an updated housing questionnaire to be used in the district moving forward. The housing questionnaire shown in evidence contains information that is inconsistent with the federal law and the McKinney-Vento definitions of homeless.</p>
Homeless	10.6	Enrollment, Intake, and Access	<p>Please provide a copy of an updated intake form to be used in the district moving forward. The forms currently in use are outdated and include information that is inconsistent with the McKinney-Vento Act under ESSA. If the district needs sample forms, please see the OSPI website for approved templates.</p>

Homeless	10.7	Unaccompanied Homeless Youth: Higher Education/FAFSA	Please provide copies of FAFSA verification letters currently in use. Blank samples cannot be accepted as evidence for compliance.
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.1	Identification	<p>Using ELPA21 testing and accurate CEDARS reporting, correct any errors that cause students to appear on the Possible Eligible Not Reported list. For each student who continues to appear on the PENR list, indicate the district's determinations or next steps.</p> <p>Submit procedures for identification of ELs (see state procedures: <a href="https://www.k12.wa.us/sites/default/files/public/migrantbilingual/pubdocs/ADA-tbiguidelinesidentification.pdf">https://www.k12.wa.us/sites/default/files/public/migrantbilingual/pubdocs/ADA-tbiguidelinesidentification.pdf</a>).</p> <p>Submit an action plan for:</p> <ul style="list-style-type: none"> <li>- training staff involved in identification of ELs on district procedures for identification.</li> <li>- ensuring that eligible ELs continue to receive services when they transfer into the district.</li> <li>- reviewing the Possible Eligible Not Reported list on a periodic basis to ensure that potentially eligible students are screened.</li> <li>- assessing students who include a language other than English on the home language survey for student's first language or student's language used at home.</li> </ul>
Title III/TBIP	7.4	Staff Qualifications	Submit an action plan for ensuring that EL instruction delivered by paraeducators is designed by a qualified teacher and for providing training related to EL instruction to paraeducators who deliver EL instruction.
Title III/TBIP	7.5	English Language	Submit an action plan providing English language development instruction that is educationally sound in theory and effective in



		Development Services	<p>practice to every English learners at the secondary level and every EL who also qualifies for Special Education.</p> <p>Program services for each student must be designed and reasonably calculated to enable students to attain English proficiency within a reasonable length of time. Include the staffing plan.</p>
CTE/Perkins	12.1	Assurances and Plan Approval	A. Please provide signed current Perkins Assurances page.
CTE/Perkins	12.2	State CTE Approval/Frameworks	B. Please list all CTE courses offered by program area, with evidence of approval, and identification of any courses offered as state and/or local equivalencies identifying the type of academic credit offered (course approval ID number, program signature page). Need to review: Agriculture Education, Business and Marketing, FACSE, Health Science, STEM.
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	<p>A. Please provide 2019-2020 advisory committee meeting minutes. (General and/or program specific).</p> <p>Sign in sheet were provided.</p> <p>B. Please provide copy of approved minutes from previous meetings. Actual review of the minutes and a motion to approve.</p>
CTE/Perkins	12.5	Professional Development/CTE Personnel	<p>C. Please provide a spreadsheet that has the instructors name, course name, Course CIP Code, V-Code, and certificate number.</p> <p>D. Please provide a written training plan for conditionally certified teachers.</p> <p>Please use the PESB website link below to determine what is required to be included on Professional Growth Plans. <a href="https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/">https://www.pesb.wa.gov/pathways-workforce-development/developing-current-educators/pgp/</a></p>
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>A. Please provide list of CTSO/CTE Leadership Opportunities in Sequim School District. LEA not include programs available in the school(s), identified by course area/educator.</p> <p>B. Please provide official membership rosters, or paid invoice and/or program of work. For any equivalent leadership</p>

			<p>program: the completed program of work on the required OSPI Equivalency Leadership Template. FBLA, STEM, TSA, HOSA, Skills USA, Robotics.</p> <p>C. Please Documentation of work-based learning opportunities provided to students participating in CTE programs, and documentation that learning is extended into the community (e.g., Supervised Agricultural Experience (SAE) documentation, service-learning activities, work-based learning, or cooperative worksite learning activities).</p>
CTE/Pe rkins	12.7	Post- Secondary Opportunities and Programs of Study	<p>A. Please provide 2019-2020 signed Program of Study Assurance Checklist form.</p> <p>The form has been uploaded in the Program Monitor Tool.</p>
Civil Rights	14.1	Compliance Coordinators	<p>B. Submit documentation of training to indicate the Title IX Coordinator’s readiness to serve as District’s Title IX Coordinator as this role relates to Athletics.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>H. Submit evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. Alternatively, submit detailed plan to provide training to all administrators and certificated and classroom personnel promptly, no later than March 27, 2020.</p> <p>TA provided previously, along with sample OSPI slide deck.</p>
Civil Rights	14.8	Course and Program Enrollment	<p>A. Describe the process the LEA uses to review disaggregated student discipline data <b>at each building at least once per year</b>. At a minimum, discipline data reviewed should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions. Discipline data must be disaggregated sex, race, EL status, special education status, and Section 504 status to identify and address disproportionalities. At a minimum, the description of the review process must include:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the review.</li> </ol>

			<p>3. How the reviews are documented.</p> <p>4. What data is reviewed.</p> <p>5. How the LEA or building determines whether disproportionalities exist.</p> <p>B. Provide evidence that the above process was implemented in the 2018–19 or 2019–20 school year. At a minimum, include:</p> <p>Student discipline data reviewed.</p> <p>1. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</p> <p>2. A list of identified disproportionalities.</p> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, evidence must include:</p> <p>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e.</i>, root cause analysis).</p> <p>2. The LEA or building’s plan to address <b>each disproportionality</b> to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</p>
Civil Rights	14.9	Student Discipline	<p>An Action plan cannot be accepted for this item. In addition, please do not rely upon Tableau data provided by OSPI for this review, as this is not building level data.</p> <p>A. Describe the process the LEA uses to review disaggregated student discipline data <b>at each building at least once per year</b>. At a minimum, discipline data reviewed should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions. Discipline data must be disaggregated sex, race, EL status, special education status, and Section 504 status to identify and address disproportionalities.</p>

			<p>At a minimum, the description of the review process must include:</p> <ol style="list-style-type: none"> <li>1. When the review occurs.</li> <li>2. Who is involved in the review.</li> <li>3. How the reviews are documented.</li> <li>4. What data is reviewed.</li> <li>5. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p>B. Provide evidence that the above process was implemented in the 2018–19 or 2019–20 school year. At a minimum, include:</p> <p>Student discipline data reviewed.</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>2. A list of identified disproportionalities.</li> </ol> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, evidence must include:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (<i>i.e.</i>, root cause analysis).</li> </ol> <p>The LEA or building’s plan to address <b>each disproportionality</b> to ensure it is not the result of discrimination (e.g., reviews of student discipline policies, procedures, and practices, and implementation of evidence-based practices reasonably calculated to address the root causes of disproportionalities).</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C. Sequim Middle School meets compliance with the Three-Part Test under Part One.</p> <p>Complete the following for the high school:  <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunitiestool.zip</a>. Once completed and uploaded, high school compliance with Three-Part Test will be assessed.</p>

Civil Rights	14.1 1	Annual Athletic Evaluation	<p>A. Describe the LEA’s <i>process</i> for annually evaluating girls’ and boys’ athletic programs at each building to identify and address disparities based on each required factor. (Provide a narrative. It is fine if process is the same at each building. If so, please indicate that this is the case.)</p> <p>B. Provide evidence that middle school athletic program is also being evaluated each year to that the overall benefits and treatment of the boys’ and girls’ athletic programs are comparable, considering the following factors:</p> <ul style="list-style-type: none"> <li>· Accommodation of interests and abilities (already addressed via Item 14.10)</li> <li>· Coaching and tutoring</li> <li>· Equipment and supplies</li> <li>· Scheduling</li> <li>· Facilities</li> <li>· Medical services and training</li> <li>· Publicity and awards</li> <li>· Travel and per diem</li> </ul> <p>A. Upload, depending.....</p> <p>D. Fundraising /Activity Form does not incorporate anything related to sex equity in sports or Title IX. Revise (and provide more information about) process for ensuring that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. The current process does not safeguard equity between the sexes when it comes to funding. For example, contributing an identical amount of money to girls’ sports and boys’ sports does not ensure equity and may, in fact, perpetuate inequity.</p> <p><b>Resources to inform process</b> can be found under 14.11 “Booster Clubs and Donations” at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs</a></p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc: N/A

Timothy McNeely, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Timothy.McNeely@k12.wa.us  
**To:** rclark@sequimschools.org  
**CC:** jmaughan@sequimschools.org; timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 Sequim School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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1/21/2021

TO: Robert Clark, Superintendent  
Sequim School District

FROM: Timothy McNeely, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is March 5, 2021.**

**Evidence Needed**

Program	Number	Description	Evidence
Homeless	10.3	Transportation	Please provide information related to the action plan submitted. The dates for action have passed. Please provide

			documentation of the outcomes of the completed action plan.
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**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title III/TBIP	7.4	Staff Qualifications	Please submit an action plan for ensuring that EL instruction delivered by paraeducators is designed by a qualified teacher and for providing training related to EL instruction to paraeducators who deliver EL instruction.
Title III/TBIP	7.5	English Language Development Services	<p>Please submit an action plan providing English language development instruction that is educationally sound in theory and effective in practice to every English learners at the secondary level and every EL who also qualifies for Special Education.</p> <p>Program services for each student must be designed and reasonably calculated to enable students to attain English proficiency within a reasonable length of time. Include the staffing plan.</p>
Civil Rights	14.1	Compliance Coordinators	B. Submit documentation of training to indicate the Title IX Coordinator's readiness to serve as the LEA's Title IX Coordinator as this role relates to Athletics.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	H. Submit evidence that all administrators and certificated and classroom personnel have received training on their responsibilities under state civil rights laws. (TA provided previously, along with sample OSPI slide deck.)
Civil Rights	14.8	Course and Program Enrollment	A. Due to COVID-19, this year the focus for 14.8 is ensuring the district has a process in place to meet the requirements of this item, to identify and eliminate discrimination at each school building related to course and program enrollment, regardless of district intent. This means a keen focus on "A" for this item.



			<p>Provide a detailed description of the process the district uses (detailed sequence of steps the district takes) to gather, review, and address conclusions drawn from that review, for item 14.8. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status at the building level. The review process system should be one that can withstand change(s) in personnel—in other words, be a sustainable system. At a minimum, the description of the review process for 14.8.A. must include:</p> <ul style="list-style-type: none"> <li>• When the review occurs</li> <li>• Who is involved in the review?</li> <li>• How the reviews are documented</li> <li>• What data is reviewed</li> <li>• How the LEA or building determines whether disproportionalities exist</li> </ul>
Civil Rights	14.9	Student Discipline	<p>A. Due to COVID-19, this year the focus for 14.9 is ensuring the district has a <i>process</i> in place to meet the requirements of this item, to identify and eliminate discrimination at each school building related to discipline, regardless of district intent. This means a keen focus on “A” for this item.</p> <p>Provide a detailed description of the <i>process</i> the district uses (detailed sequence of steps the district takes) to gather, review, and address conclusions drawn from that review, for item 14.9. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status <i>at the building level</i>. The review process system should be one that can withstand change(s) in personnel—in other words, be a sustainable system. At a minimum, the description of the review process 14.9.A. must include:</p> <ul style="list-style-type: none"> <li>• When the review occurs</li> <li>• Who is involved in the review?</li> <li>• How the reviews are documented</li> <li>• What data is reviewed</li> </ul>

			<ul style="list-style-type: none"> <li>• How the LEA or building determines whether disproportionalities exist</li> </ul>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C. Sequim Middle School meets compliance with the Three-Part Test under Part One.</p> <p>However, Sequim HS does not meet compliance with Part 1, 2, or 3 of the three-part test. Girls are the underrepresented sex at this school. To meet compliance with part one, Sequim HS would need to add 72 sports opportunities for girls (cheer cannot be counted as a sport under part 1). The school does not meet compliance with part two, as it does not have a history and continuing practice of program expansion of girls' teams. The school does not meet compliance with part three as there is insufficient evidence to suggest that the school's current program effectively accommodates the interests and abilities of girls.</p> <p>Submit an action plan outlining the steps the district will take to equally accommodate the athletic interests and abilities of girls at Sequim HS (part 3). The school, for example, could accommodate the unmet interests of girls by removing cut policies, expanding squad sizes, adding new sports or new squad levels. The plan should take into consideration girls' answers (summarized) on the most recent Student Athletic Interest Survey Summary for Sequim HS.</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A. Describe the LEA's <i>process</i> for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor (a narrative).</p> <p>D. Fundraising /Activity Form does not incorporate anything related to sex equity in sports or Title IX. The current process does not safeguard equity between the sexes when it comes to funding. For example, contributing an identical amount of money to girls' sports and boys' sports does not ensure equity and may, in fact, perpetuate inequity.</p> <p>Describe the process the LEA will use to ensure that outside sources of athletic funding—including</p>

			<p>fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (How and what documentation is kept as evidence this review process is used?)</p> <p>Resources to inform process can be found under 14.11 “Booster Clubs and Donations” at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/equity-school-athletic-programs</a></p>
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cc:

Jennifer Maughan, CPR Contact, Sequim School District

**Needs Work**

**From:** tony.may@k12.wa.us  
**To:** jpryne@sequimschools.org  
**CC:** ralcafaras@sequimschools.org; cpr@k12.wa.us; tony.may@k12.wa.us  
**Subject:** 2019-2020 Sequim School District Review Needs Work  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

3/23/2022

TO: Jane Pryne, Superintendent  
Sequim School District

FROM: Tony May, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**

Please know that we are attempting to close out your review by March 25, 2022. Please contact the assigned reviewer for any clarification or technical assistance you may need at this time, or I can help facilitate any questions.

**Evidence Needed** No evidence needed items found for this checklist.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C. At Sequim High School 24 additional opportunities for girls are needed to reach proportionality at, where the average team size for girls is 16. (Part One of the Three-Part Test). This school does not have a history and continuing practice of program expansion for girls (Part Two), and the district has not provided evidence that the school's current program effectively accommodates the interests and abilities of girls (Part Three).</p> <p>Please submit an action plan to bring Sequim HS into compliance with Part Three of the Three-Part Test, taking into consideration the summary of results for the school's most recent Student Athletic Interest Survey, in particular the top sports girls have indicated they would be interested in playing. The reason the district gave in the Three-Part Test for not adding badminton was unresponsive. At the HS 80 girls indicate they would be interested in playing this sport! (Very high interest!) The district can meet compliance with Part Three of the Three-Part Test by adding this sport for girls at the high school, perhaps as an intramural sport to start to "test the waters" with the goal of adding it as an interscholastic sport if it proves to be a successful sport at the intramural level. (Students across the state are indicating a great interest in badminton, so could become a competitive interscholastic sport!)</p>

Civil Rights	14.11	Annual Athletic Evaluation	D. Describe the process the LEA will use to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (How and what documentation is kept as evidence this review process is used?) This cannot be a "plan to plan."  Resources provided previously.
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cc:

Renee Alcafaras, CPR Contact, Sequim School District

**Final Approval Completed**

**From:** Jason.Miller@k12.wa.us  
**To:** jpryne@sequimschools.org  
**CC:** ralcafaras@sequimschools.org; tony.may@k12.wa.us; cpr@k12.wa.us  
**Subject:** Final Closure for Sequim School District Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200

k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/1/2022

TO: Jane Pryne, Superintendent  
Sequim School District

FROM: Jason Miller, Executive Director Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Closure of Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 1/23/2020-1/23/2020 is closed. There are no further items to be addressed in Program Monitor. Please continue the work implementing any approved action plans.

Note that a previous email was sent with additional information about evidence needed, or noncompliant items.

If you have any questions or concerns about the information provided in this report or if you need further assistance, please contact Jason Miller, Executive Director for Elementary Education, Early

Learning, Special Programs & Federal Accountability at [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us) or 360-764-6079.  
The agency TTY number is (360) 664-3631.

--

cc:

Renee Alcafaras, CPR Contact, Sequim School District

Jason Miller, Executive Director for Elementary Education, Early Learning, Special Programs &  
Federal Accountability



## Review Scheduled

**From:** timothy.mcneely@k12.wa.us

**To:** dcurtis@lacrossesd.k12.wa.us

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - LaCrosse School District

**Attachments:** No attachments found for this message.



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## SUPERINTENDENT OF PUBLIC INSTRUCTION

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/7/2019

TO: Doug Curtis, Superintendent  
LaCrosse School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 3/5/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/7/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday following the review date indicated (3/5/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us

**To:** dcurtis@lacrossesd.k12.wa.us

**CC:** japietila@lacrossesd.k12.wa.us; Sylvia.Reyna@k12.wa.us; timothy.mcneely@k12.wa.us; Gayle.pauley@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Dierk.Meierbachtol@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; isaac.conver@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - LaCrosse School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/5/2020

TO: Doug Curtis, Superintendent  
LaCrosse School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 3/5/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that

is required for noncompliant items or evidence needed. Your follow-up due date is 4/19/2020.

Should you have any questions or if I may assist in facilitating any items, please contact me at 360-725-4474.

**Commendation(s)**

Program	Commendation Note
11. Highly Capable	District is commended for a variety of services provided to advanced learners in elementary and secondary grades.
14. Civil Rights	The district was very responsive to early technical assistance, which was deeply appreciated.

**Technical Assistance (no response needed)**

Program	Technical Assistance Note
1. Title I, Part A	1.12.E: The annual Title IA Meeting on 2/20/20 had no parents in attendance. Two additional dates have been scheduled. As the auditor looks at this subsection, the agenda and sign-in sheets will need to be uploaded at that time.
11. Highly Capable	<p>11.4 - Regarding reference to not having enough identified students to provide certain types of services (We have only four identified students grades K-6 and four grades 7-12, and because many of the competitions and other opportunities require more than just a few students, they are therefore not an opportunity we can currently offer.) HiCap funds may be used for activities that are not exclusively for identified students; also, supplemental programs such as robotics provided through other funding sources can be counted as service for a Highly Capable student based on interest.</p> <p>11.6 - When annually evaluating effectiveness of identification process, please review the number of low-income students who are referred, number identified for services, and trend over time. Identify what strategies are working to provide more equitable access to services.</p> <p>11.6- When preparing a survey for families and students about potential HiCap services, give several examples of current practice and ask for feedback (keep and do more of, make changes) and examples of services the district is capable of providing in addition or</p>

instead of. Consider collaborating with neighboring districts to provide opportunities. Contact Jody Hess for suggestions and examples.

We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's *Access and Equity/Pedagogies and Strategies for Highly Capable* modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to *Highly Capable*. <https://moodle1.ospi.k12.wa.us/>. District may host the modules on your own website. For technical assistance, please contact us.

14.  
Civil  
Rights

**14.2: Nondiscrimination Statement.** For future reference, OSPI has a model nondiscrimination statement districts may use, available here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/nondiscrimination-statement-districts>.

**14.3: Handbook Language.** For future reference, OSPI has model handbook language that can be used in both the student and staff handbooks, available here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights> (scroll to 14.3, Sample Handbook Language). OSPI also has a model staff training that can be used to train administrators and classroom and certificated staff on their civil rights obligations, available here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights> (scroll to 14.3, Sample Staff Training Slide Deck).

**14.4: Section 504.** Adopting and using OSPI's model forms is a good way to ensure that each student's file contains a full set of documentation and that the correct legal standards are being used consistently. Additionally, while a medical diagnosis can certainly an important piece of the evaluation data, one is not required, and a diagnosis should never be the only piece of data considered. Under Section 504, the team is required to consider evaluation data from a variety of sources, and to base its decisions on all data collected--not just upon a medical diagnosis. Please make sure to define general terms (like "extra time" or "preferential seating") so that it is clear what each student needs.

**14.5: Language Assistance for LEP Parents.** Even if the district has not identified any LEP parents, it should still be prepared to provide language access services in the event that a non-English-speaking family moves into the district. The district is strongly encouraged to begin developing a process for ensuring that interpretation and translation services would be provided if necessary. WSSDA has a model policy and procedure (#4812/4812P) that might be a useful starting point.

**14.8 and 14.9: Annual Data Reviews.** Even if the district's numbers are small, it is still responsible for tracking its specialized course and program data (Item 14.8) and its student discipline data (Item 14.9) over time and taking affirmative steps to correct any significant disproportionalities via targeted corrective action. For small districts, analyzing several years' worth of data may be a more valuable endeavor. Regardless, the district is strongly encouraged to keep more complete documentation of its analysis and of the disproportionalities it identifies each year. That way, it will be better equipped to identify potentially problematic trends over time.

**14.10.B and .C: Survey Results and Athletics Opportunities Worksheet.** B: Survey Results. It may be simplest to use OSPI's Survey Results Summary Worksheet, available here: <https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx>. Next time the district conducts the survey, it will want to make sure it notes the top 5 sports requested by girls and boys in each building, as well as the top reasons for non-participation in each building. These are necessary in order for the district to analyze Part 3 of the 3-Part Test (14.10.C). C: Part 1: Cheer is not usually considered as an athletic participation opportunity for purposes of Part 1 of the Three-Part Test. Guidance on what activities are counted is available here: <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.pdf>. Each district has an obligation to ensure that it is providing its students with athletics participation opportunities that are free from sex discrimination. This obligation applies equally to sending and receiving districts who have formed an athletics co-op or combine. Ideally, the sending and receiving districts in an athletics co-op or combine are able to work together to ensure that they are meeting their obligations under Title IX and state law (i.e., the survey, survey results, athletics opportunities worksheet, annual athletics evaluation, and outside sources of athletics funding). One option is for the sending and receiving district athletic directors to meet at least annually to discuss the athletics interest survey, athletics opportunities worksheet, annual athletics evaluation, and outside sources of athletics funding.

**14.11.A-D: Annual Athletics Evaluation and Outside Sources of Athletics Funding.** OSPI would still encourage the district to work with the receiving districts (St. John/Endicott) to ensure that they are providing equitable benefits and treatment to male and female athletes with respect to each factor in the annual athletics evaluation. As mentioned in 14.10, one option is for the sending and receiving district athletic directors to meet at least annually to discuss the athletics interest survey, athletics opportunities worksheet, annual athletics evaluation, and outside sources of athletics funding.

15. Fiscal	<i>Accounts Payable Charges</i> -Pre-approval should be obtained before all purchases are made.
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**Action Plan(s) Approved (no response needed; programs who have approved an action plan anticipate the local program will implement the action steps as noted for completion in each plan)**

Program	Number	Description
Title I, Part A	1.2	Title I, Part A Set-Asides
Highly Capable	11.6	Program Evaluation
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment

**Evidence Needed (please respond in the program monitoring tool)**

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	3/3/20 Please upload signed Board Minutes for Lauren Anderson in this Program Monitor and in the EE Data Collection Tool.
Homeless	10.6	Enrollment, Intake, and Access	Please upload multiple copies of your intake form filled out.
Highly Capable	11.5	Program Services	Please provide record over time of services for one student to include area(s) identified as strengths and interest, and brief description of services provided each year of enrollment; or provide action plan to establish program record over time.
Civil Rights	14.9	Student Discipline	<p>A: Process. The district still needs to supplement its narrative description by including responses to the following prompts:</p> <ul style="list-style-type: none"> <li>• How are the student discipline review meetings (data and analysis) documented?</li> <li>• What method does the district use to determine whether a significant disproportionality exists?</li> </ul>

**Noncompliant Item(s) (please respond in the program monitoring tool)**



Program	Number	Description	Actions Required
CTE/Perkins	12.2	State CTE Approval/Frameworks	<p>A. Please provide a copy of the current year course catalog(s) identifying CTE courses.</p> <p>B. Please provide list of all CTE courses offered by program area, with evidence of approval, and identification of any courses offered as state and/or local equivalencies identifying the type of academic credit offered. (Evidence may include course approval ID number, program approval signature page, etc.)</p> <p>C. Please upload approved framework for Agriculture and Career Choices.</p>
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	<p>A. Please provide current year advisory committee meeting minutes. (General and/or program specific, depending upon LEA's CTE program offerings)</p> <p>B. Please provide a copy of approved minutes from previous meetings.</p> <p>C. Please provide signed membership roster that reflects representatives from the program specific business, industry, and community agencies. (List must include member names, and specific stakeholder group they represent).</p> <p>D. Please provide evidence of program evaluation for CTE program.</p>
CTE/Perkins	12.4	Special Populations	<p>C. Please provide evidence of support offered to CTE students, examples of evidence include: tutorial services; language assistance; 504 plans; IEPs; or achievement evaluations for special population students (LEP, foster children, individuals preparing for non-traditional fields, see special populations as described).</p>
CTE/Perkins	12.5	Professional Development/CTE Personnel	<p>A. Please provide evidence of LEA offered professional development opportunities for teachers, administrators, specialized instructional</p>

			<p>support personnel, career guidance and academic counselors or paraprofessionals.</p> <p>B. Please provide list of all staff involved in CTE programs professional development opportunities (list must include names of LEA staff, staff/teacher assignment(s), date(s) of the PD, and conference/workshop titles).</p> <p>C. Please provide evidence that each instructor assigned to CTE course holds a current CTE certificate to teach the identified classes. (Evidence can include list of teacher/course CIP code/V-code/certification number)</p> <p>D. Please provide proof of a written training plan for any conditionally certified instructor.</p>
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>A. Please provide list of Career and Technical Student Organizations (CTSOs) and equivalency leadership programs available in the school, identified by course area/educator.</p> <p>B. Please provide for any CTSO: a copy of official membership rosters, official charter letter or paid invoice and/or a program of work. For any equivalent leadership program: the completed program of work on the required OSPI Equivalency Leadership Template.</p> <p>C. Please provide documentation of work-based learning opportunities provided to students participating in CTE programs, and documentation that learning is extended into the community (e.g., Supervised Agricultural Experience (SAE) documentation, service-learning activities, work-based learning, or cooperative worksite learning activities)</p> <p>D. Please provide documentation that time is allowed for staff coordination of extended learning.</p>

CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	D. Please provide list of available industry recognized certificate/credentials or dual credit opportunity by course area(s) currently offered, including evidence of opportunity. (Example: Earned certificate)
Civil Rights	14.1	Compliance Coordinators	B: Evidence of Training. Please submit evidence that the Title IX officers (Mr. Pietila and Mr. Gates) have received sufficient training to fulfill their roles as such. Both still need to submit evidence they have trained on the discrimination complaint procedure, and Mr. Gates should also submit evidence he has been trained in athletics equity. Suggested resources to review are included in the technical assistance section of this report.
Civil Rights	14.8	Course and Program Enrollment	A: Process. Please describe how the district documents the discussions it has during its review sessions (i.e., meeting minutes, notes, worksheets, etc.). Also, please clarify that the review team is considering data from the elementary, middle, and high school grades separately. This is because the state law requires the review to consider building-level, not district-level, data.  B: Evidence of implementation. The district still needs to submit the following: <ul style="list-style-type: none"> <li>• A narrative describing how the district analyzed each data set to identify disproportionalities.</li> <li>• A list of any significant disproportionalities.</li> </ul>
Fiscal	15.3	Payroll Charges	The district was not compliant with time and effort for the following reasons:  -No time and effort documentation was completed for one employee during the 18/19 school year. Time and effort documentation is required for employees who are paid partially or

			<p>in full with federal funds, in order to document their time spent working on the program.</p> <p>-One employee completed a monthly PAR, but it did not specify the cost objectives that were charged to. Additionally, the PAR was only signed once for a 6-month period. The PAR should be signed monthly, after all work has been performed.</p> <p>Additional information can be seen in the Time &amp; Effort guidelines in the OSPI Addendum to Bulletin B048-17. This has also been attached to the CPR tool in 15.3.</p> <p>Please provide an action plan detailing how the District will ensure Time &amp; Effort guidelines will be followed.</p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

January Pietila, CPR Contact, LaCrosse School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Needs Work

**From:** Sylvia.Reyna@k12.wa.us  
**To:** dcurtis@lacrossesd.k12.wa.us  
**CC:** japietila@lacrossesd.k12.wa.us; timothy.mcneely@k12.wa.us; deifi.stolz@k12.wa.us; pat.smithson@k12.wa.us; jennifer.bliss@k12.wa.us  
**Subject:** 2018-19 LaCrosse School District Review Needs Work  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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5/29/2020

TO: Doug Curtis, Superintendent  
LaCrosse School District

FROM: Sylvia Reyna, Team Lead

RE: 2018-19 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**

**Evidence Needed**

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualifications	Please upload signed board minutes for Lauren Anderson in this program monitor and in the EE Data Collection.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	D. Please provide evidence of program evaluation for CTE program. CTE Program Evaluation Template has been uploaded.
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	D. Please provide Action Plan to address providing industry-recognized certification examinations or other assessments leading towards a recognized postsecondary credential (Perkins V - Sec. 135 (b)(5)(F).  Action Plan Template has been uploaded.

cc:

January Pietila, CPR Contact, LaCrosse School District

**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** dcurtis@lacrossesd.k12.wa.us  
**CC:** japietila@lacrossesd.k12.wa.us; Sylvia.Reyna@k12.wa.us;  
timothy.mcneely@k12.wa.us  
**Subject:** Final Approval for LaCrosse School District for Consolidated Program Review (CPR)  
2019-20  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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6/10/2020

TO: Doug Curtis, Superintendent  
LaCrosse School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 3/5/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

cc:

January Pietila, CPR Contact, LaCrosse School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us

**To:** bbaum@libertysd.us

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Liberty School District

**Attachments:** No attachments found for this message.



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## SUPERINTENDENT OF PUBLIC INSTRUCTION

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/7/2019

TO: Brett Baum, Superintendent  
Liberty School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 3/5/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical



Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/7/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday following the review date indicated (3/5/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us

**To:** bbaum@libertysd.us

**CC:** [afletcher@libertysd.us](mailto:afletcher@libertysd.us); smix@libertysd.us; Sylvia.Reyna@k12.wa.us; timothy.mcneely@k12.wa.us; Gayle.pauley@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Dierk.Meierbachtol@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; isaac.conver@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Follow-up Report - Liberty School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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3/6/2020

TO: Brett Baum, Superintendent  
Liberty School District

FROM: Gayle Pauley, Assistant Superintendent

Special Programs and Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On 3/5/2020, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your district participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 4/19/2020.

Should you have any questions regarding the review or if I may facilitate any items, please contact me at 360-725-4474.

**Technical Assistance (no response needed)**

Program	Technical Assistance Note
7. Title III/TBIP	7.9-Please consider the use of a program evaluation framework as a way to do meaningful reflection about the program aspects that are the most impactful in the lives of students.
10. Homeless	<p>10.1: WSSDA updated the homeless policy 3116 in July 2019. Please update your district policy ASAP to reflect the changes in state law regarding building level contacts. Thank you.</p> <p>10.3: When sharing transportation between districts, make sure both districts have been included in the process and have signed-off regarding the cost and responsibility for services.</p> <p>10.5: The training materials for staff still include outdated language such as "awaiting foster care" which was removed from the McKinney-Vento Act in 2015. The district website also includes "awaiting foster care" reference, which needs to be corrected/removed. Please make these corrections immediately per ESSA/McKinney-Vento reauthorization.</p>
11. Highly Capable	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to <i>Highly Capable</i>. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>. District may host the modules on your own website. For technical assistance, please contact us.</p>
14. Civil Rights	<p><b>14.10 (Accommodating Student Interests and Abilities (Three-Part Test))</b></p> <p>Please know that many districts' Student Athletic Interest Survey summaries—across the state, are indicating high interest in badminton. Liberty HS is definitely not the only school! You might connect with other districts to explore whether this could be a viable sport in your district. (Plus, it looks like you have girls at the JH who are also interested in playing badminton.) You might consider testing the waters by offering badminton as an intramural sport, with the intent of making it a competitive sport</p>

down the line. Schools could also include in its plan to meet compliance with Part Three by removing cut policies, expanding squad sizes, etc.

**Evidence Needed (respond using Program Monitoring tool)**

Program	Number	Description	Evidence
Test Fee Reduction	5.1	Eligibility	FRPL students do not pay any co-pay or fee. The test is paid for by OSPI. Please update and resubmit evidence,
Test Fee Reduction	5.3	Exam Payment Process	See 5.1
Title II, Part A	6.1	Teacher Professional Qualifications	3/3/20 Please upload March 26th signed Board Minutes for Aaron Watson in this Program Monitor and in the EE Data Collection Tool.
Title III/TBIP	7.2	Parent Notification	Please address this component in the Action Plan you complete for 7.1 rather than doing a separate Action Plan.
Title III/TBIP	7.4	Staff Qualifications	TS is assigned to a fourth-grade classroom position. Please provide evidence of a qualified staff member who can provide second language instruction in Washington State.  If the para is the only qualified person to deliver EL instruction, please provide evidence of her ongoing PD as required in 7.4.D
Title III/TBIP	7.5	English Language Development Services	There appear to be two different types of programs described. Please review the allowable program models in WA State under the TBIP guidelines and available in Form Package 219. Please clarify if you are providing a Sheltered Instructional Program or a Supportive Mainstream Program. Please supply evidence of a curriculum specifically designed for second language acquisition. Please identify how you are making content language accessible and providing an LEP.
Title III/TBIP	7.7	Professional Development	Submit an action plan for providing professional development training in compliance with TBIP. Training should be provided for administrators, teachers,

			counselors, and other staff on the district's English language development program, appropriate use of instructional strategies and assessment results, and curriculum and instructional materials for use with culturally and linguistically diverse students.
Title III/TBIP	7.12	Bilingual Education	Please submit evidence that real and persistent barriers to providing bilingual instruction prohibit you from doing so in order fulfill WAC 392-160-010.
Title III/TBIP	7.13	TBIP Eligible Exited Students	Submit an action plan that describes a menu of academic support provided to eligible exited students not at grade level. Please indicate who is responsible for the monitoring and referral of exited students who are at risk. Please indicate the specific allowable activities that TBIP funds for these students. Since exited students are among the most vulnerable in terms of not graduating, please provide evidence that you verified that they are not struggling at least once per quarter. If none of your exited students have demonstrated risk, please provide evidence that this monitoring took place and was communicated.
Homeless	10.5	Identification of Students	Please provide a copy of an updated housing questionnaire to be used moving forward, as the housing questionnaire currently in use (and shown in evidence) includes language that is not consistent with federal law. If you need an updated sample, please see the OSPI Homeless Education website. The district website includes "awaiting foster care" reference, which needs to be corrected/removed as the federal law eliminated this language in 2015 with reauthorization.
Highly Capable	11.5	Program Services	Please provide program record over time for one student from identification through current school year, or action plan to develop this. It will include identified areas of strength and interest, and brief description of services provided to the student over time.
Highly Capable	11.6	Program Evaluation	Please provide evidence of review in the three areas required by RCW. It will include data reviewed, and changes based on outcomes.

Civil Rights	14.4	Section 504	C. Submit an example of a filled-out consent for initial evaluation form.
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**Noncompliant Item(s) (respond in Program Monitoring tool)**

Program	Number	Description	Actions Required
Title III/TBIP	7.1	Identification	There was a consistent pattern of missing documentation. Submit an action plan that all potential English learners are identified for services. Please identify who will be responsible for reading the Home Language Survey and making the referral to screen. Please identify who will be responsible for administering the screener, and referring the child for services if appropriate. Please identify who will be responsible for administering annual training to guarantee that no students will go unidentified in the future. Please also describe a system by which you will make sure all test scores and parent notifications were sent out in a timely manner.
Highly Capable	11.2	Identification Process & Consent	<p>Please remove reference to specific standardized assessment scores (top 5%, 95th percentile in two areas.) The definition in the law is: “Highly capable students are students who perform or show potential for performing at significantly advanced academic levels when compared with others of their age, experiences, or environments.” No specific score is required in RCW or WAC as this is not valid assessment practice. Standard error of measure must be factored into selection decisions. “Multiple objective criteria” is to be reviewed as a whole to determine if a student needs accelerated learning and enhanced instruction, without use of “cut” scores. Single domain strengths (math or ELA) are to be identified and served.</p> <p>Please revise appeal process as follows: Parents are not to be required to pay for assessments used in the</p>

			appeal process. This is a barrier to a student being identified and served as Highly Capable.
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	A. Please provide Program of Program of Study Assurances that are signed and dated by the Postsecondary Institution.
Civil Rights	14.1	Compliance Coordinators	B. Provide evidence of training for Title IX Coordinator on non-athletic aspects of Title IX, such as sexual harassment. Self-training resources provided previously.
Civil Rights	14.8	Course and Program Enrollment	<p>Recent uploads do not meet requirements below. Please call Kristin if you need assistance with this item. 360-725-6162.</p> <p>A. Describe:</p> <ol style="list-style-type: none"> <li>1. How the reviews will be documented (so that work can withstand inevitable changes in staff)</li> <li>2. Which course and programs will be reviewed at each school (List course and program for review. Do not include those courses or programs that <b>all</b> students take. Instead, review those that just some students take, such as advance math, CTE course, Highly Capable services, etc.</li> <li>3. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p>B. Provide <b>evidence</b> that the above process was implemented in the 2018–19 <b>or</b> 2019–20 school year. At a minimum, include:</p> <ol style="list-style-type: none"> <li>1. Course and program enrollment <b>data</b> reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol> <p>C. If disproportionalities were identified, evidence that the LEA or building is addressing <b>each</b> disproportionality to ensure it is not the result of</p>



			<p>discrimination. At a minimum, evidence must include, for each disproportionality:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building’s analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building’s plan to address (reduce and eliminate) <b>each disproportionality, including actions that will begin during the next year—before the next annual review</b></li> </ol>
Civil Rights	14.9	Student Discipline	<p>Recent uploads do not meet requirements below. Please call Kristin if you need assistance with this item. 360-725-6162.</p> <p>A. Evidence uploaded to document school building-based discipline reviews is insufficient. As no action plans are accepted for this item, the district must conduct the review for Liberty Elementary/Junior High School and Liberty High School now, even if in future years the reviews will happen in June. At a minimum, the review should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions. The LEA has described, in part, its process for reviews. Please supplement this with information about:</p> <ol style="list-style-type: none"> <li>1. How the reviews will be documented (so that work can withstand inevitable changes in staff)</li> <li>2. How the LEA or building determines whether disproportionalities exist.</li> </ol> <p>B. Provide <b>evidence</b> that the above process was implemented in the 2018–19 <b>or</b> 2019–20 school year. At a minimum, include:</p> <ol style="list-style-type: none"> <li>1. Discipline data reviewed.</li> <li>2. A narrative, report, or meeting minutes that demonstrate how the LEA or building analyzed the data to identify disproportionalities.</li> <li>3. A list of any identified disproportionalities.</li> </ol>

			<p>C. If disproportionalities were identified, evidence that the LEA or building is addressing each disproportionality to ensure it is not the result of discrimination. At a minimum, evidence must include:</p> <ol style="list-style-type: none"> <li>1. A narrative, report, or meeting minutes that demonstrate the LEA or building's analysis to determine the causes of disproportionalities (i.e., root cause analysis).</li> <li>2. The LEA or building's plan to address <b>each disproportionality</b> to ensure it is not the result of discrimination</li> </ol>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C. Girls are underrepresented at the following buildings. These schools do not have a history and continuing practice of program expansion for girls, and have not provided evidence that the school's current program effectively accommodates the interests and abilities of girls. <b>More detail needed to meet compliance with Part Three of the Three-Part Test for both schools below (see Technical Assistance for this item).</b></p> <ol style="list-style-type: none"> <li>1. Liberty High School (21 additional opportunities for girls are needed to reach proportionality at this HS. The average team size for girls at this school is 8). More detail needed to meet compliance with Part Three of the Three-Part Test.</li> <li>2. Liberty Jr High School (54 additional opportunities for girls are needed to reach proportionality at this school. The average team size for girls at this school is 7).</li> </ol> <p>Submit an <b>action plan</b> for each school outlining the steps the district will take to equally accommodate the athletic interests and abilities of girls. The plans should incorporate sports girls in their building indicated they would be interested in playing, as identified in the school's most recent Student Athletic Interest Survey summary.</p>

Civil Rights	14.11	Annual Athletic Evaluation	<p>A.-C. Describe how the LEA will begin annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor, below:</p> <ol style="list-style-type: none"> <li>1. Students' athletic interests and abilities (<b><i>this is evaluated under 14.10</i></b>);</li> <li>2. Scheduling of games and practices;</li> <li>3. Equipment, uniforms, and supplies;</li> <li>4. Facilities;</li> <li>5. Coaching;</li> <li>6. Publicity and awards;</li> <li>7. Medical services and training;</li> <li>8. Travel and per diem; and</li> <li>9. Housing, laundry and dining facilities and services</li> </ol> <p>D. Process uploaded makes no mention of ensuring sex equity in sports. Upload a description of the process the LEA will begin using to ensure that athletic fundraising, donations, and booster clubs do not result in disparities that favor one sex over another. Board adopted fundraising policies and procedures are not required. Training for coaches and others involved with funding for athletics about your process is strongly encouraged as part of your plan. Include who will be involved in the process and how implementation of the process will be documented.</p> <p>Resources to assist in meeting compliance with this item provided previously.</p>
Fiscal	15.3	Payroll Charges	<p>Item 1</p> <p>The documentation provided does not reflect actual Time &amp; Effort. It's not signed or dated and does not track time. Looks like the District pays based on budget and not actuals.</p> <p>Time and Effort January 2019 crossed out and written February for all staff - not signed or dated.</p>

			<p>Title I/LAP Reading Schedule for December 2018 but signed by Mary 03/4/19 - District did not document whether this was a set schedule or not.</p> <p>No payroll recap for the month of February was provided.</p> <p>All employees charged to federal grants must document the time they spend working on the grant's objectives to demonstrate that the amounts charged to federal programs are true and accurate.</p> <p>Please review Bulletin 048-17 uploaded under 15.3 to determine the type of Time and Effort required.</p> <p>Provide an action plan regarding the determination of the type of documentation needed, training for staff and timeline of implementation.</p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Aaron Fletcher, CPR Contact, Liberty School District

Sharon Mix, Fiscal Contact, Liberty School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Needs Work

**From:** Sylvia.Reyna@k12.wa.us  
**To:** bbaum@libertysd.us  
**CC:** [afletcher@libertysd.us](mailto:afletcher@libertysd.us); smix@libertysd.us; timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 Liberty School District Review Needs Work  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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6/29/2021

TO: Brett Baum, Superintendent  
Liberty School District

FROM: Sylvia Reyna, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**

**Evidence Needed**

Program	Number	Description	Evidence
Highly Capable	11.5	Program Services	Please submit a record demonstrating a continuum of program services over time for one student or submit an action plan that demonstrates the steps to be implemented in alignment with a continuum of program services. The evidence should include identified areas of strength and interest, and a brief description of services provided to the student each year from identification through the current school year.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Civil Rights	14.1	Compliance Coordinators	B. Please provide evidence of training for Title IX Coordinator on non-athletic aspects of Title IX, such as sexual harassment. Self-training resources provided previously.
Civil Rights	14.4	Section 504	C. Please submit an example of a filled-out consent for initial evaluation form.
Civil Rights	14.8	Course and Program Enrollment	A. Please provide a detailed description of the process the district will use moving forward (detailed sequence of steps the district will take) to gather and review discipline data at each building to identify and address potential disproportionalities. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status (again, at the building level). The review process system should be sustainable, one that can withstand change(s) in personnel. At a minimum, the description of the review process for 14.9.A. must answer the following:  <ol style="list-style-type: none"> <li>1. When will the review occur?</li> <li>2. What types of discipline will be reviewed (<i>at a minimum, the review should include suspensions,</i></li> </ol>

			<p><i>including in-school, short-term, and long-term, as well as expulsions and emergency expulsions)?</i></p> <p>3. Who, by title, will gather and report (share) disaggregated discipline data to the review team?</p> <p>4. Who, by title, will be on the review team? (<i>Who will analyze data reports to identify disproportionalities, determine why they exist, and create the plan to respond to those identified disproportionalities?</i>)</p> <p>5. Who, by title, will maintain the record of each annual review (<i>so that past reviews are incorporated into current reviews</i>)?</p> <p>6. How will the reviews be documented? (For example: <i>In what format will data be shared with review team? How is the LEA preserving its analysis of the reports? How will the LEA record its plans to respond to the identified disproportionalities?</i>)</p> <p>7. How will the LEA determine whether disproportionalities exist?</p> <p><b>Resources and Tools on Student Discipline</b> Please see 14.9 School Discipline at: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p>
Civil Rights	14.9	Student Discipline	<p>A. Please provide a detailed description of the <i>process</i> the LEA uses (detailed sequence of steps the district takes) to gather, review, and address conclusions drawn from that review, for item 14.9—<i>for each building</i>. Data for this item must be disaggregated by sex, race, EL status, special education status, and Section 504 status <i>at the building level</i>. The review process system should be one that can withstand change(s) in personnel—in other words, be a sustainable system. At a minimum, the review should include suspensions (both in-school, short-term, and long-term), expulsions, and emergency expulsions.) The description of the review process 14.9.A. should answer the following:</p> <p>1. When does the review occur?</p>

			<p>2. What types of discipline are reviewed (<i>at a minimum, the review should include suspensions, including in-school, short-term, and long-term, as well as expulsions and emergency expulsions</i>)?</p> <p>3. Who, by title, gathers and reports (shares) disaggregated discipline data to the review team?</p> <p>4. Who, by title, is on the review team? (<i>Who analyzes data reports to identify disproportionalities, determines why they exist, and creates the plan to respond to those identified disproportionalities?</i>)</p> <p>5. Who, by title, maintains the record of each annual review (<i>so that past reviews are incorporated into current reviews</i>)?</p> <p>6. How are the reviews be documented? (For example: <i>In what format is data shared with review team? How does the LEA preserve its analysis of the reports? How does the LEA record its plans to respond to the identified disproportionalities?</i>)</p> <p>7. How does the LEA determine whether disproportionalities exist?</p> <p><b>Resources and Tools on Student Discipline</b> Please see 14.9 School Discipline at: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C. Please respond to the actions required noted below:</p> <p>1. Liberty High School: Plan submitted by district to meet Part Three of the Three-Part Test does not sufficiently address lack of proportionality indicated by Part One calculation (54 additional opportunities for girls are needed to reach proportionality at this school. The average team size for girls at this school is 7), as the plan only adds two sports opportunities for girls. Nor does the plan suggest consideration was given to results of the school’s most recent Student athletic Interest survey, in which 10 girls indicated an interest in playing Badminton. Please revise plan to address these issues.</p>



			<p>2. Liberty Jr High School: No plan submitted to meet Part Three of the Three-Part Test. Please submit. Plan should take into consideration sports of interest to girls, as indicated in most recent Student Athletics Interest survey. Reminder: 54 additional opportunities for girls are needed to reach proportionality at this school. The average team size for girls at this school is 7).</p> <p>Please refer to resources sent previously for any additional information regarding this component.</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A. Please submit a description of how the LEA will begin annually evaluating girls’ and boys’ athletic programs at each building to identify and address disparities based on each required factor, below (<b><i>provide a narrative—think sequential steps</i></b>):</p> <ol style="list-style-type: none"> <li>1. Students’ athletic interests and abilities (<i>this is evaluated in detail under 14.10</i>)</li> <li>2. Scheduling of games and practices</li> <li>3. Equipment, uniforms, and supplies</li> <li>4. Facilities</li> <li>5. Coaching</li> <li>6. Publicity and awards</li> <li>7. Medical services and training</li> <li>8. Travel and per diem; and</li> <li>9. Housing, laundry and dining facilities and services</li> </ol> <p>C. If the athletic evaluation identified disparities that favor one sex at any building, upload evidence that the LEA or building is taking effective steps to correct the disparity. If no disparities were identified, please describe grounds for N/A determination.</p> <p>D. Describe the <i>process</i> the LEA uses to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (What sequential step are taken? How and what</p>

			documentation is kept as evidence this review process is used?)
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cc:

Aaron Fletcher, CPR Contact, Liberty School District

Sharon Mix, Fiscal Contact, Liberty School District

**Final Approval Completed**

**From:** Jason.Miller@k12.wa.us  
**To:** jjeske@libertysd.us  
**CC:** [afletcher@libertysd.us](mailto:afletcher@libertysd.us); jpuckett@libertysd.us; Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us  
**Subject:** Final Approval for Liberty School District for Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

3/28/2022

TO: Jerrad Jeske, Superintendent  
Liberty School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 3/5/2020-3/25/2022 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

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CC:

Aaron Fletcher, CPR Contact, Liberty School District

Joy Puckett, Fiscal Contact, Liberty School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us  
**To:** mmorgan@reardansd.net  
**CC:** phoffman@reardansd.net; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Reardan-Edwall School District  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/7/2019

TO: Marcus Morgan, Superintendent  
Reardan-Edwall School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 4/23/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/7/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact and any staff your LEA may deem appropriate. Usually the exit conversation takes place on the Friday following the review date indicated (4/23/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to

respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Pam Hoffman, CPR Contact, Reardan-Edwall School District

**Needs Work**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** esobotta@reardansd.net  
**CC:** [phoffman@reardansd.net](mailto:phoffman@reardansd.net); [jray@reardansd.net](mailto:jray@reardansd.net); [jflaa@reardansd.net](mailto:jflaa@reardansd.net); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us)  
**Subject:** 2019-2020 Reardan-Edwall School District Review Needs Work  
**Attachments:** No attachments found for this message.

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PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

12/15/2021

TO: Eric Sobotta, Superintendent  
Reardan-Edwall School District

FROM: Sylvia Reyna, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Please respond by January 12, 2022.**

Should you have any questions regarding these items, you may contact the reviewer directly or I may assist in facilitating any questions.



**Evidence Needed**

Program	Number	Description	Evidence
Homeless	10.5	Identification of Students	<p>A. 1. The Housing Questionnaire in evidence is outdated and must be revised. Please see the sample Housing Questionnaire on the OSPI website for an example. <a href="http://www.k12.wa.us/HomelessEd/Resources.aspx">http://www.k12.wa.us/HomelessEd/Resources.aspx</a></p> <p>Please provide a copy of the revised form as evidence as well as an assurance that all old forms have been removed from circulation and replaced with the revised form.</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>C: Please provide a copy of the Athletic Opportunities Tool filled out for the high school. The tool provided in the last couple of updates includes only the middle school.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
CTE/ Perkins	12.2	State CTE Approval/Frameworks	<p>B. Please provide CTE program approval signature pages for Agriculture, Business and Marketing, and Family and Consumer Sciences Education.</p>
CTE/ Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>B. Please provide a copy of the FLBLA affiliated membership roster or paid invoice.</p>

Civil Rights	14.1	Compliance Coordinators	The district's last update included an action plan for the Title IX Coordinator to participate in training in September 2021. Please clarify what specific training the Title IX Coordinator participated in.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>The district's action plan did not address the information requested in the last required action. Please clarify and provide the following:</p> <p>(1) The training materials to be used, or a summary of the topics that will be addressed, (2) how the district will ensure all administrators and certificated and classroom personnel receive the training, (3) who will be responsible for providing the training, and (4) the date the training will occur (must occur as promptly as possible).</p> <p>OSPI has sample training materials available: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx</a></p>

cc:

Pam Hoffman, CPR Contact, Reardan-Edwall School District

JoLynn Ray, CPR Contact, Reardan-Edwall School District

Justin Flaa, Fiscal Contact, Reardan-Edwall School District

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** esobotta@reardansd.net  
**CC:** phoffman@reardansd.net;jray@reardansd.net;jflaa@reardansd.net;  
Sylvia.Reyna@k12.wa.us; timothy.mcneely@k12.wa.us; pat.smithson@k12.wa.us;  
sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Michaela.Miller@k12.wa.us;  
Rebecca.Wallace@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2020-21 Follow-up Report - Reardan-Edwall  
School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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4/22/2021

TO: Eric Sobotta, Superintendent

Reardan-Edwall School District

FROM: Timothy McNeely, Director

Consolidated Program Review and Rural Education

RE: Consolidated Program Review (CPR) 2020-21 Report

On 4/22/2021, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action

that is required for noncompliant items or evidence needed. Your follow-up due date is 7/21/2021.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Technical Assistance**

Program	Technical Assistance Note
6. Title II, Part A	<p>Item 6.1 - LEAs are advised to update their student information systems by ensuring courses at all levels are linked to specific state course codes. Districts are encouraged to eliminate the use of WA0006 and WA0007 and instead use the state course code that best corresponds with the content of the course. This better prepares districts for federal and state reporting while reducing central office and/or registrar workload by eliminating manual course definitions in the EEDC tool.</p> <p>Item 6.3 - District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
11. Highly Capable	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to <i>Highly Capable</i>. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>. District may host the modules on your own website.</p> <p>Please contact Jody Hess for assistance with identification and services for students, as well as allowable uses for Highly Capable apportionment. <a href="mailto:Jody.Hess@k12.wa.us">Jody.Hess@k12.wa.us</a></p> <p><a href="#">RCW 28A.185.220</a></p> <p>Please schedule your policy 2190 for revision and approval by your Board following changes to requirements for Highly Capable identification in 2018 legislative session. Include the district-specific information in the policy template.</p>
14. Civil Rights	<p>14.1 Compliance Coordinators</p> <p>Please update your civil rights coordinator and Section 504 coordinator (and Title IX coordinator, if changed since the 2019-20 school year) contact information on OSPI's</p>

webpage: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators>

The district should ensure that the new designated civil rights compliance coordinator and Section 504 coordinator have received training on their responsibilities. OSPI has sample job descriptions and self-guided training resources for these roles on its website at <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights>.

**14.2 Nondiscrimination Statement**

With staffing changes related to designated coordinators, the District should ensure it reviews its publications for nondiscrimination statements and update statements with current coordinator names and contact information.

**Action Plan(s) Approved** No "action plan approved" items found for this checklist.

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part A	1.2	Title I, Part A Set-Asides	LEAs are required to set aside Title I funds to support homeless students every year. In SY 18-19, the district set aside \$7600. Please provide documentation that shows the budgeted amounts and expenditures tracked for this set-aside.
Title I, Part A	1.6	Equitable Services with Private Schools Located Outside of LEA	<p>The description provided explains how the district communicates with in-district private schools, but this question is asking about out-of-district private school participation.</p> <p>Please describe the process used to determine whether there were out-of-district private schools that indicated they wanted to participate in Title I equitable services and may have eligible district students.</p> <p>Here is an example:</p> <p><i>Every year when we complete the Title I grant application, we access the "out-of-district private schools" link to determine whether an out-of-district private school wants to participate in Title I has Reardan-Edwall students enrolled. Then, we contact the private school to determine whether the students are eligible for Title I services (low-income and would have attended a Title I school if had enrolled in</i></p>

			<i>district). If the students are eligible, the district sets aside funds to provide services.</i>
Title I, Part A	1.7	LEA Parent Family Engagement Policy	<p>1.7A: The uploaded newsletter provides a summary of the LEA family engagement policy, but it does not include all of the required components of the LEA family engagement policy required by ESEA. See the first column of <a href="https://www.k12.wa.us/sites/default/files/public/titlei/parentfamilyengagement/pubdocs/leaandschoolside-by-siderequirements.docx">https://www.k12.wa.us/sites/default/files/public/titlei/parentfamilyengagement/pubdocs/leaandschoolside-by-siderequirements.docx</a> for the required components.</p> <p>Please provide the full board approved LEA family engagement policy which includes all required components. This could be WSSDA Policy 4130 from 2018 or more recently. WSSDA Policy 4130 was uploaded in item 1.12 but is dated 2011.</p> <p>1.7B: Provide a copy of the dated parent notification inviting parents to participate in development of PFE policy/procedures.</p>
Title I, Part A	1.12	School Parent Family Engagement Policy/Plan	<p>1.12 A: The uploaded policy is the district-level policy and does not include the required components of a school-level policy. Here is an example: <a href="https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.12%20A%20PFE%20Plan_Policy%20Example.pdf">https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.12%20A%20PFE%20Plan_Policy%20Example.pdf</a>. See the second column of <a href="https://www.k12.wa.us/sites/default/files/public/titlei/parentfamilyengagement/pubdocs/leaandschoolside-by-siderequirements.docx">https://www.k12.wa.us/sites/default/files/public/titlei/parentfamilyengagement/pubdocs/leaandschoolside-by-siderequirements.docx</a> for the requirements of a school-level policy.</p> <p>1.12 B-E: Please provide more information about parent involvement in the development of the school parent and family engagement policy/plan. The documentation shows that the district has a parent advisory committee but does not reflect that the school policy was discussed or reviewed.</p>
Title I, Part A	1.15	Schoolwide Program	Update Component 4 of the Schoolwide Plan. The district does not receive Title III, so Title III should not be included in Component 4, the list of programs included in the schoolwide. The district does receive TBIP, but TBIP funds cannot be combined within the schoolwide. Please remove Title III from the list of programs.
Title III/TBIP	7.1	Identification	Some documentation has not been uploaded. For all students requested, please upload Home Language Survey and Screener results with names and dates visible. Please provide a descriptive statement regarding student 9179350890. She appears to have exited the

			<p>program according to documents provided in 7.13, but 7.1 and 7.2 contain evidence that the family wished to change the HLS after that date. If the HLS was changed, please upload evidence that the family submitted a written request to do so and the CEDARS entry showing that the child was exited using code P.</p> <p>The uploaded protocol for enrolling new students is not in full compliance with state law. As this is the district's protection against claims of profiling, please amend it so that it adequately protects all parties. All students in the State of Washington must complete a Home Language Survey (HLS) upon enrollment. All students for whom another language is reported in questions 2 and 3 (and only those questions) of the HLS, must be screened within 10-day, and all families must be notified, in a language of their choosing, of program placement within 30 days. If a student has moved from another district in Washington, school staff must retrieve the records of service from the LEP Application in EDS. If the last English proficiency test was not administered within a period of two years, the student must be screened within 10 days.</p>
Title III/TBIP	7.2	Parent Notification	Actions requested in 7.1 will also satisfy 7.2.
Title III/TBIP	7.4	Staff Qualifications	7.4 Washington State law requires the provision of designated English language development instruction by a teacher with an English Learner or Bilingual Education endorsement. Federal guidance only describes the use of a paraprofessional as allowable when districts are recruiting properly endorsed teachers to provide designated English language development instruction. Please upload amended schedules to demonstrate that elementary and middle school students have regular time with an EL/BE endorsed teacher or upload an Action Plan to hire a properly endorsed teacher within the next funding cycle.
Title III/TBIP	7.5	English Language Development Services	Please upload evidence of a curriculum specifically developed for English language acquisition that provides instruction in the four domains of language development. Literacy interventions developed for native English-speaking students do not adequately support literacy development in bilingual children. Without adequate designated English instruction, students are unlikely to reach grade level proficiency and become statistically unlikely to graduate.

			<p>Please clarify who is providing services for student 5794656305 and how often services are provided.</p> <p>The tracking of instructional minutes being provided to students is excellent.</p>
Title III/TBIP	7.8	Use of Funds	Please provide clarification of the expenditures listed under Activity 27.
Title III/TBIP	7.13	TBIP Eligible Exited Students	Please provide a menu of services available to exited students.
Gun-Free	8.2	Policy	Please up-load evidence to support 8.2.B - Evidence that policy has been made available to pupils, parents, teachers (e.g., 1 or 2 sample pages from calendars, handbooks, websites, newsletters, etc.).
Rural Education	9.1	Identified Needs	A) Please provide a narrative that outlines the proposed activities as indicated in iGrants FP 225 and how these activities address the unique needs of the district.
Rural Education	9.2	Rural Education Initiative	<p>Please submit evidence from the 2019-20 school year of Rural Education activities.</p> <p>The submitted evidence shows activities performed in the 2018-19.</p>
Homeless	10.4	LEA Liaison	C. Building staff can identify/name the LEA homeless liaison, and the LEA liaison's name/contact information is included on homeless informational materials posted in the building or distributed at the building level. Some LEAs also have building-level liaisons (the upload is blank).
Homeless	10.5	Identification of Students	<p>A. 1. The Housing Questionnaire in evidence is outdated and must be revised.</p> <p>Please see the sample Housing Questionnaire on the OSPI website for an example. <a href="http://www.k12.wa.us/HomelessEd/Resources.aspx">http://www.k12.wa.us/HomelessEd/Resources.aspx</a></p> <p>Please provide a copy of the revised form as evidence as well as an assurance that all old forms have been removed from circulation and replaced with the revised form.</p>



Homeless	10.6	Enrollment, Intake, and Access	Please provide evidence of multiple examples of intake forms from students that have been identified as experiencing homelessness (more than one example is required).
Homeless	10.7	Unaccompanied Homeless Youth: Higher Education /FAFSA	Please provide evidence of the template you have for the verification letters to show independent student status for purposes of FAFSA completion. Templates are okay in this case since you have noted that you have no seniors currently identified.
Homeless	10.8	Early Childhood	A: Please provide evidence of coordination between the LEA's McKinney-Vento program and the LEA's preschool program(s.) Evidence may include proof of preschool staff training, copies of homeless education parent resources, completed housing questionnaires.  B: This may be satisfied depending on what is provided in response to A.
Homeless	10.9	Community Collaboration	Please provide further evidence of coordination with community resources. Does the Liaison belong to or coordinate with any service organizations such as Lions or Rotary in surrounding communities? Has the liaison provided any trainings on the rights and identification of children and youth experiencing homelessness to community partners?
Homeless	10.10	Posting of Rights and Parent Information	A: Please upload evidence of NCHE posters in all LEA buildings and in the community, brochures, homeless student rights posted on LEA website, etc. Evidence should also appear throughout the community where homeless people are likely to see them. e.g., public libraries, shelters, soup kitchens, etc. (the upload is blank).
Civil Rights	14.1	Compliance Coordinators	B: Please provide evidence that the district's Title IX coordinator has received training in their role as Title IX coordinator. Evidence could include training materials, certificates of attendance, agendas, or attestations of self-training (e.g., lists of materials reviewed on OSPI's

			Equity and Civil Rights website, along with approximate dates of review).
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	H: Please provide a copy of the training materials for training all administrators and certificated and classroom personnel on their responsibilities under state civil rights laws. In previous years, OSPI's review of this training found it did not meet state law requirements.
Civil Rights	14.4	Section 504	C: The Section 504 plan documentation provided is no longer accessible in Program Monitor. Please re-upload Section 504 plan documentation for two students at each school, including the following:  (1) Parent consent for initial evaluation.  (2) Evaluation documentation.  (3) Parent consent for initial placement.  (4) Section 504 plans.
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	C: Please provide a copy of the Athletic Opportunities Tool filled out for the high school.
Fiscal	15.2	Accounts Payable Charges	Please provide responses to the following:  15.2A Describe the LEA's process, including the names/positions of key staff, for ensuring federal expenditures are allowable, comply with procurement requirements, and ensures vendors and subrecipients are not suspended or debarred.  Title I Item 1: Provide approval for the order/purchase.

			<p>Item 2: Provide PO 1091800557 Provide approval for the order/purchase.</p> <p>Title II Item 3: Provide approval for the order/purchase.</p> <p>Item 4: Provide PO 1091800259 Provide approval for the order/purchase.</p> <p>Title IV Item 5: Provide approval for the order/purchase or agreement between ESD and school district.</p> <p>See upload "Fiscal Request Rearden-Edwall1" below for full information.</p>
Fiscal	15.3	Payroll Charges	<p>Please provide responses to the following:</p> <p>Item 1: Why does Time and Effort not track Title I? Please provide Payroll Recap showing pay distribution for this pay period.</p> <p>Item 2: Please provide Payroll Recap showing pay distribution for this pay period.</p> <p>See upload "Fiscal Request Rearden-Edwall1" below for full information.</p>
Foster Care	17.1	LEA Foster Care Liaison	<p>A) The submitted Name/Title of the district Foster Care Liaison does not align with that found on the OSPI Foster Care Contacts Webpage. Please visit the following link to request a change to this information and submit evidence of that request:</p> <p><a href="https://www.k12.wa.us/student-success/access-opportunity-education/foster-care/foster-care-liaisonsdcyf-contacts">https://www.k12.wa.us/student-success/access-opportunity-education/foster-care/foster-care-liaisonsdcyf-contacts</a></p>
Foster Care	17.2	Collaboration with Local Child Welfare Agency	<p>A) Please upload the fully signed and executed Interagency Agreement with DCYF.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Title I, Part A	1.4	Annual LEA Report Card	<p>In sharing the LEA report card with families:</p> <ul style="list-style-type: none"> <li>- link directly to the district's report card page:  <a href="https://washingtonstatereportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100215">https://washingtonstatereportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100215</a> OR</li> <li>- provide directions to families of how to get from the state report card to the LEA page (as in the newsletter example: <a href="https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.4%20Newsletter%20Example%20with%20Directions.pdf">https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.4%20Newsletter%20Example%20with%20Directions.pdf</a>).</li> </ul> <p>Provide evidence of how the district provided this information to parents either in the 19-20 or 20-21 school year.</p>
CTE/Perkins	12.2	State CTE Approval/Frameworks	<p>A. Please provide copy of 2020-21 course catalog. The one provided was updated Spring of 2019.</p> <p>B. Please provide list of CTE course offered by program area, course approval ID number, approval page, etc. The system error indicates the file may have been removed or name changed. Please note the naming convention.</p> <p>C. Please provide approved current Ag Ed, AFNR framework. The one uploaded was a screen shot of the CTE application from 6/4/2014. It is not valid.</p> <p>Please provide approved Business and Marketing, IT framework. Uploaded screen shot of the 5/17/19 approved CTE application.</p> <p>Please provide current FACSE framework for Nutrition and Wellness. This is on the old form and no indication of when last modified.</p>
CTE/Perkins	12.3	Community and Educational Partnership	<p>Please provide evidence of program evaluations for CTE program.</p>

		s and Program Evaluation	
CTE/Perkins	12.4	Special Populations	<p>B. Please provide evidence of how the district is addressing barriers to enrollment in CTE courses.</p> <p>C. Please provide evidence of support offered to CTE students, examples of evidence include: 504 plans; IEPs, language assistance, tutorial services.</p>
CTE/Perkins	12.5	Professional Development/CTE Personnel	Please provide evidence of professional development opportunities for teachers, administrators, specialized instructional support personnel, career guidance and academic counselors, or paras.
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>B. Please provide a copy of affiliated membership rosters, paid invoice, or program of work.</p> <p>C. Please provide evidence of a student's entire SAE project documentation.</p>
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	Please provide evidence of dual credit being offered in Biology/Natural Resources. How do students and parents know about this opportunity? Where is it posted? How is it communicated? In what languages?
Civil Rights	14.2	Nondiscrimination Statement	<p>A: The nondiscrimination statement on the district's website needs to be updated to include the full list of protected classes in Washington law. Please submit evidence that the nondiscrimination statement on the website also includes sexual orientation, gender identity, gender expression, creed, veteran, or military status, and used of a trained dog guide or service animal by a person with a disability.</p> <p>A sample nondiscrimination statement is available at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-outreach-materials">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-outreach-materials</a>.</p>

Civil Rights	14.7	National Origin and Immigration Status (Student Enrollment and Registration)	<p>A: The district may not require a student to provide a birth certificate to enroll in school. The district's registration packet must be revised to allow for alternative documentation options (that do not indicate a student's citizenship or immigration status) for students who do not have a birth certificate or do not wish to provide it.</p> <p>Please submit (1) a revised registration packet and (2) an assurance or evidence that the noncompliant forms are no longer used at the district.</p> <p>Guidance on types of proof of age documentation is available at <a href="https://www2.ed.gov/about/offices/list/ocr/docs/qa-201405.pdf">https://www2.ed.gov/about/offices/list/ocr/docs/qa-201405.pdf</a>(see questions 5 &amp; 6).</p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Pam Hoffman, CPR Contact, Reardan-Edwall School District

JoLynn Ray, CPR Contact, Reardan-Edwall School District

Justin Flaa, Fiscal Contact, Reardan-Edwall School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Preliminary Compliance Report**

**From:** Sylvia.Reyna@k12.wa.us

**To:** esobotta@reardansd.net

**CC:** phoffman@reardansd.net;jray@reardansd.net;jflaa@reardansd.net;  
Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us; jody.hess@k12.wa.us;  
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kristin.hennessey@k12.wa.us; jon.mishra@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Report - Reardan-Edwall School District

**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200

k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/22/2022

TO: Eric Sobotta, Superintendent  
Reardan-Edwall School District

FROM: Jason Miller, Executive Director, Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Consolidated Program Review (CPR) 2021-22 Preliminary Report

On 4/22/2021–4/22/2021, a team from the Office of Superintendent of Public Instruction (OSPI) conducted a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items currently reported or evidence needed. Your follow-up due date is 12/30/2021.

This email is preliminary to the final report. The final version of the report will be issued from OSPI as soon as possible. Follow-up for any additional items included in the final report will be required within 45 days from the receipt of the final report.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendations:** N/A

**Technical Assistance:**

Program	Technical Assistance Note
6. Title II, Part A	<p>Item 6.1 - LEAs are advised to update their student information systems by ensuring courses at all levels are linked to specific state course codes. Districts are encouraged to eliminate the use of WA0006 and WA0007 and instead use the state course code that best corresponds with the content of the course. This better prepares districts for federal and state reporting while reducing central office and/or registrar workload by eliminating manual course definitions in the EEDC tool.</p> <p>Item 6.3 - District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
11. Highly Capable	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to <i>Highly Capable</i>. <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a>. District may host the modules on your own website.</p> <p>Please contact Jody Hess for assistance with identification and services for students, as well as allowable uses for Highly Capable apportionment. <a href="mailto:Jody.Hess@k12.wa.us">Jody.Hess@k12.wa.us</a></p> <p><a href="#">RCW 28A.185.220</a></p>



	Please schedule your policy 2190 for revision and approval by your Board following changes to requirements for Highly Capable identification in 2018 legislative session. Include the district-specific information in the policy template.
12. CTE/Perkins	It is important to have CTE program evaluations done in collaboration with the respective CTE Program Advisory Committees. Please have the Advisory Chairperson, Advisory Members, CTE Instructor, CTE Director, and Building Principal sign and date the evaluations and keep a hard copy on file.
14. Civil Rights	<p>14.1 Compliance Coordinators</p> <p>Please update your civil rights coordinator and Section 504 coordinator (and Title IX coordinator, if changed since the 2019-20 school year) contact information on OSPI's webpage: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/school-district-charter-school-compliance-coordinators</a></p> <p>The district should ensure that the new designated civil rights compliance coordinator and Section 504 coordinator have received training on their responsibilities. OSPI has sample job descriptions and self-guided training resources for these roles on its website at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>.</p> <p>14.2 Nondiscrimination Statement</p> <p>With staffing changes related to designated coordinators, the District should ensure it reviews its publications for nondiscrimination statements and update statements with current coordinator names and contact information.</p>

**Action Plan(s) Approved**

Program	Number	Description
Title I, Part A	1.2	Title I, Part A Set-Asides
Title I, Part A	1.4	Annual LEA Report Card
Title I, Part A	1.7	LEA Parent Family Engagement Policy
Title III/TBIP	7.1	Identification
Title III/TBIP	7.2	Parent Notification

**Evidence Needed**

Program	Number	Description	Evidence
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	C: Please provide a copy of the Athletic Opportunities Tool filled out for the high school. The tool provided in the last couple of updates includes only the middle school.

**Noncompliant Items:**

Program	Number	Description	Actions Required
Civil Rights	14.1	Compliance Coordinators	The district's last update included an action plan for the Title IX Coordinator to participate in training in September 2021. Please clarify what specific training the Title IX Coordinator participated in.
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>The district's action plan did not address the information requested in the last required action. Please clarify and provide the following:</p> <p>(1) The training materials to be used, or a summary of the topics that will be addressed, (2) how the district will ensure all administrators and certificated and classroom personnel receive the training, (3) who will be responsible for providing the training, and (4) the date the training will occur (must occur as promptly as possible).</p> <p>OSPI has sample training materials available: <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/ospisamplestafftraining.pptx</a></p>

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The

agency TTY number is (360) 664-3631.

cc:

Pam Hoffman, CPR Contact, Reardan-Edwall School District

JoLynn Ray, CPR Contact, Reardan-Edwall School District

Justin Flaa, Fiscal Contact, Reardan-Edwall School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Final Approval Completed**

**From:** cpr@k12.wa.us

**To:** esobotta@reardansd.net

**CC:** phoffman@reardansd.net;jray@reardansd.net;jflaa@reardansd.net;  
Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us

**Subject:** Final Notice for Reardan-Edwall School District for Consolidated Program Review (CPR) 2019-20

**Attachments**  
: No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/22/2022

TO: Eric Sobotta, Superintendent  
Reardan-Edwall School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Closure of Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 4/23/2020 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

Note that a previous email was sent with a listing of program review items that were not closed under evidence needed or noncompliant. These items will be considered as part of a risk assessment for future compliance monitoring.

If you have any questions, please feel free to contact me.

cc:

Pam Hoffman, CPR Contact, Reardan-Edwall School District

JoLynn Ray, CPR Contact, Reardan-Edwall School District

Justin Flaa, Fiscal Contact, Reardan-Edwall School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## **MOA CPR Program Monitor Reports 2020–2021**

The following LEAs received an MOA CPR Program Monitor desk review that began during the 2020–2021 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish.

- Odessa School District
- Lind School District
- Ritzville School District

**Review Scheduled**

**From:** timothy.mcneely@k12.wa.us

**To:** readd@odessa.wednet.edu

**CC:** gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us;  
Timothy.McNeely@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Odessa School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/7/2019

TO: Dan Read, Superintendent  
Odessa School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your Desk, Full, review is 4/23/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and

Technical Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/7/2019. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two hour (1-2) phone exit with your LEA's superintendent or designee, your CPR contact and any staff your LEA may deem appropriate. Usually the exit conversation takes place on the Friday following the review date indicated (4/23/2020). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the phone exit via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further



evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2019. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Review Schedule Updated**

**From:** timothy.mcneely@k12.wa.us  
**To:** readd@odessa.wednet.edu  
**CC:** weishaarj@odessa.wednet.edu; timothy.mcneely@k12.wa.us;  
Sylvia.Reyna@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2020-2021 Schedule Update - Odessa School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/10/2020

TO: Dan Read, Superintendent  
Odessa School District

FROM: Timothy McNeely, Director

Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2020-2021 Schedule Update

The date of your review has been updated. It is now scheduled for 4/20/2021. Please submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.

cc:

Juli Weishaar, CPR Contact, Odessa School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Follow-up Report to District

**From:** Sylvia.Reyna@k12.wa.us

**To:** readd@odessa.wednet.edu

**CC:** weishaarj@odessa.wednet.edu; Sylvia.Reyna@k12.wa.us; timothy.mcneely@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2020-21 Follow-up Report - Odessa School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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4/21/2021

TO: Dan Read, Superintendent  
Odessa School District

FROM: Timothy McNeely, Director

Consolidated Program Review and Rural Education

RE: Consolidated Program Review (CPR) 2020-21 Report

On 4/20/2021, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 6/4/2021.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Technical Assistance**

Program	Technical Assistance Note
1. Title I, Part A	<p>The LEA is encouraged to:</p> <ul style="list-style-type: none"> <li>include a link on your webpage to the NAEP-State Comparisons page as this will be a CPR requirement beginning with 2020-21 reviews: <a href="https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N">https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N</a>,</li> <li>include the complaint procedure in the newsletter, rather than refer to the website for this information,</li> <li>have the teacher sign the Compact.</li> </ul>
2. LA P	<p><b>2.1C:</b> A more thorough explanation is needed beyond the list of curriculum and resources used for intervention supports.</p> <p>At least 1 piece of evidence of best practice implementation is needed (PD materials, agenda(s), sign-in sheets, PLC meeting notes, coaching sequence, district approved budget requests).</p> <p>Thank you for providing more information. Section now marked as "compliant."</p>
6. Title II, Part A	<p>Item 6.1 - LEAs are advised to update their student information systems by ensuring courses at all levels are linked to specific state course codes. Districts are encouraged to eliminate the use of WA0006 and WA0007 and instead use the state course code that best corresponds with the content of the course. This better prepares districts for federal and state reporting while reducing central office and/or registrar workload by eliminating manual course definitions in the EEDC tool.</p> <p>Item 6.3 - District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>

10.	Please contact me if you have additional questions.  Homeless
11.	We are glad to help districts move forward to improve Highly Capable procedures and highly services. OSPI has created a series of 10 online professional learning modules about highly identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to <i>Highly Capable</i> . <a href="https://moodle1.ospi.k12.wa.us/">https://moodle1.ospi.k12.wa.us/</a> . District may host the modules on your own website.  Please contact Jody Hess for assistance with identification and services for students, as well as allowable uses for Highly Capable apportionment.  <a href="mailto:Jody.Hess@k12.wa.us">Jody.Hess@k12.wa.us</a>
15.	Title I Grant (0203178) July 1, 2018 - August 31, 2019, was over charged 1,046.70 for Larry Weber's pay from August 2018. Since this grant and the 2019-20 school year grant overlap by two months and carryover had not been processed over to the 2019-20 yet, the charges were placed against the incorrect grant year. The District will talk to the Grants Management supervisor to better understand the date process in claiming expenditures and will make sure they do not double charge the Title I expenditures for 2019-20 grant.

**Action Plan(s) Approved** No "action plan approved" items found for this checklist.

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part A	1.2	Title I, Part A Set-Asides	1.2.A: Please provide a 2018-19 Title I, Part A homeless student set-aside expenditure report that includes expenditures, not only the budgeted amounts. Also, please include the homeless student set-aside subcode on the document.  Here is an example of what we want

			<a href="https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.2%20A%20Homeless%20Set-Aside%20Example.pdf">https://www.k12.wa.us/sites/default/files/public/titlei/titlei/1.2%20A%20Homeless%20Set-Aside%20Example.pdf</a>
Title I, Part A	1.4	Annual LEA Report Card	1.4.A: Please provide evidence that the Report is disseminated to the larger community (those without students in OSD) via non-digital means.
Title I, Part A	1.5	95 Percent Student Participation in Statewide Mathematics and Reading/Language Arts Assessments	Based on last time we reviewed this item we needed additional information on desegregated data of all groups that did not meet the 95% participation.  Please upload an action plan to let us know how you will be addressing this item in the future if your LEA does not meet the 95% participation and how your LEA will address it by group.
Title I, Part A	1.18	Targeted Assistance Program Evaluation	1.18: Please provide the specific adjustments that are being made to the targeted assistance program based on review of the data. The activities in the "monitor and adjust" column appears to be for all students and lacks specificity.
Homeless	10.1	LEA Policy	10.1 A. Please review and update the WSSDA Procedures template to include items C and D of the Enrollment Rights and Services Definitions.  Please review and update the WSSDA Policy to include additional information in the Best Interest Determination, Informed Consent for Healthcare and Facilitating on-time Grade Level Progression sections.
Homeless	10.3	Transportation	10.3 A. Could you please explain your process for how you would respond procedurally to a McKinney-Vento eligible family requesting transportation support that is 50 miles or more away?
Homeless	10.5	Identification of Students	10.5.A- Please download and use our Housing Questionnaire form. A housing questionnaire is required to be sent to each student enrolled in your school each school year. The form you have uploaded here is an intake form; it is not a Housing Questionnaire. I see that it is present in 10.6 but it also needs to be present here.
Homeless	10.8	Early Childhood	10.8 A- Please provide information in greater detail about McKinney-Vento training provided.

Homeless	10.9	Community Collaboration	<p>10.9 A- Please provide additional evidence to support <u>ongoing</u> and regular contact with community agencies and entities. Evidence may include additional correspondences regarding several other appointment dates throughout the year.</p> <p>10.9 A- Please provide evidence the coordinates services occur beyond (or in addition to) Birth-3.</p>
Homeless	10.11	Title I Set-Aside	<p>10.11 A, B, C. Each district is required to set aside funds, even if the funds are not spent within the school year. This is to ensure that that each district is prepared to support McKinney-Vento-eligible students as they become eligible and as they are identified.</p> <p>These funds are also in place and may be used to pay for McKinney-Vento-related Professional Development opportunities for staff/teachers, Liaison FTE etc.</p> <p>Please provide evidence to support the designation and use of these funds for this purpose.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Homeless	10.4	LEA Liaison	<p>10.4 B- Please download the attestation template from our website and submit a complete attestation regarding the fulfillment of McKinney-Vento liaison duties and information related to the liaison FTE. (Sample available on OSPI Homeless Education website under the "resources" link).</p> <p>10.4 C- Please take a picture of your Homeless Information poster with the liaison picture on it and upload it here as well.</p>
Homeless	10.10	Posting of Rights and Parent Information	<p>10.10 B - Please upload evidence of the NCHC parent brochure as being readily available. The NCHC parent brochure titled, "What You Need to Know to Help Your Child in School" can be ordered on the OSPI website:</p> <p><a href="http://www.k12.wa.us/HomelessEd/Posters.aspx">http://www.k12.wa.us/HomelessEd/Posters.aspx</a></p> <p>10.10 C- Please provide evidence of additional McKinney-Vento parent information regarding services and supports for students experiencing homelessness. Evidence may include information</p>

			email distributed at the beginning of the year, questionnaire form, survey, school newsletter with McKinney-Vento contact information, etc.
CTE/Perkins	12.2	State CTE Approval/Frameworks	C. Please provide current Ag, Food, and Natural Resources Framework. The one submitted was for 4/25/16. This one is not valid.
CTE/Perkins	12.3	Community and Educational Partnerships and Program Evaluation	D. Please provide program evaluation for Agriculture.
CTE/Perkins	12.5	Professional Development/CTE Personnel	C. Please provide current CTE certificates for Jeffery R. Wehr and Daniel M. Read. The ones submitted were expired. * Jeffery R. Wehr Ed Certificate, 420315D. CTE Conditional Teacher (Renewal). Issue Date: 2/20/2019, Expiration Date: 6/30/2020, Endorsements: STEM Technology (V141000)   Expired * Daniel M. Read Ed Certificate, 311778E. CTE Ed Continuing Teacher (Renewal). Issue Date: 7/30/2014, Expiration Date: 6/30/2020   Expired
CTE/Perkins	12.6	Leadership, Employability, and Extended Learning Opportunities	C. Please provide work-based learning forms that have been completed with student information. The WBL forms submitted were blank.
CTE/Perkins	12.7	Post-Secondary Opportunities and Programs of Study	D. Please provide evidence of students' earned Microsoft Certifications for Word, Excel, and PowerPoint.
Civil Rights	14.2	Nondiscrimination Statement	A-E. Missing or incorrect information in nondiscrimination statement(s). (Compare to sample nondiscrimination statement below). Upload evidence of updated nondiscrimination statement on:  A. Website



			<p>B. Newsletter or a similar publication</p> <p>C. Student/parent handbook or a similar publication</p> <p>D. Job announcement or employment application</p> <p>CTE publication, announcement, or student recruitment materials. <i>Please indicate if the district does not have a CTE program</i></p> <p>F. Online or ALE program publication, announcement, or recruitment materials. <i>Please indicate if the district does not have an online or ALE program</i></p> <p>While not required, the easiest way to meet compliance on this item is to use the following sample nondiscrimination statement:</p> <p><b>Sample Nondiscrimination Statement for Odessa SD</b> (<i>review district-specific contact information</i>)</p> <p>Odessa School District does not discriminate in any programs or activities on the basis of sex, race, creed, religion, color, national origin, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, the presence of any sensory, mental, or physical disability, or the use of a trained dog guide or service animal and provides equal access to the Boy Scouts and other designated youth groups. The following employee has been designated to handle questions and complaints of alleged discrimination: Civil Rights, Title IX, and Section 504 Coordinator, Dan Read, 509-982-2668, read@odessa.wednet.edu; 311 E. 1st Ave, Odessa, WA 99159.</p> <p><i>Note:</i> In place of Coordinator name(s), district may use Coordinator’s title instead (e.g., Superintendent, HR Director, Principal)</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>E. Good info about discrimination and the complaint process, but no information about sexual harassment. Upload handbook language the district will place in the 2021-22 student handbook regarding discrimination, sexual harassment, and the discrimination complaint procedure. The most straightforward way to meet compliance for this item is to use OSPI’s sample handbook language, at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a> under Item #14.3. This sample handbook language meets notification requirements for both sexual harassment as</p>

			<p>well as the discrimination complaint procedures (and is translated into ten different languages).</p> <p>H. Submit an action plan describing how the district will ensure that all administrators and certificated and classroom personnel will receive training about civil rights compliance and the district's discrimination complaint process. This training should take place as soon as possible (but no later than the start of school year 2021-22) and include information about Washington's protected classes, forms of discrimination, recognizing different forms of discrimination, how staff must respond to allegations of discrimination, and the district's discrimination complaint procedure (WSSDA's 3210/P or equivalent). Training must consist of more than the provision of written material.</p> <p>Action plan for training should include:</p> <ol style="list-style-type: none"> <li>1. An outline of the training (or please state that the district will use OSPI's sample training slide deck will be used—found under item 14.3 at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a>.)</li> <li>2. A description of how the district will ensure that <u>all</u> administrators and certificated and classroom personnel receive the training</li> <li>3. A description of how the district will document that all administrators and certificated and classroom personnel receive the training (sign-in sheets are typical)</li> <li>4. When the training will take place</li> </ol> <p>Who will for provide the training (district staff may conduct the training)?</p>
Civil Rights	14.4	Section 504	<p>B. Under what circumstance would the district conduct a manifestation determination meeting?</p> <p>C. Please submit complete Section 504 plan documentation for two students at each the elementary, middle/junior high school, and high school levels. Section 504 documentation for each of the students should include</p> <p>(1) parent consent for initial evaluation</p>

			<p>(2) evaluation documentation</p> <p>(3) parent consent for initial placement</p> <p>(4) Section 504 plans</p>
Civil Rights	14.6	English Language Development Services	<p>A-B.</p> <p><b>Identification:</b></p> <p>The district indicates it uses the OSPI Home Language Survey (HLS) to identify students who must be screened for EL services.</p> <ul style="list-style-type: none"> <li>· What information from the HLS will indicate a student should be formally assessed to determine eligibility for EL services?</li> <li>· What person (by title) will flag this information and who will ensure (by title) that students identified for screening are screened for EL services within 10 days of enrollment?</li> </ul> <p><b>Screening for EL Eligibility:</b></p> <ul style="list-style-type: none"> <li>· What screener will the district use to determine whether a student is eligible for EL services?</li> <li>· How will results of the screener be used to identify if a student needs and is entitled to receive EL services?</li> </ul> <p>How will results of the screener be used to identify if determine a student no longer needs (exits) EL services?</p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>A-B. The district has not used the OSPI Student Athletic Interest Survey (required under WAC 392-190-040). Please submit an action plan for administering the OSPI <a href="#">Student Athletic Interest Survey</a> and disaggregating the answers to each question by sex at each building that offers athletics as soon as possible, but no later November 1, 2021. (The district may use the <a href="#">Student Athletic Interest Survey: Results Worksheet</a> (Word) to disaggregate results.)</p> <p><b>Resources:</b></p> <p><a href="#">Survey Instructions</a> (Includes instructions for administering the survey and analyzing the results, information about the Three-Part Test, and frequently asked questions)</p>

			C. Please upload <a href="#">Athletic Opportunities Worksheet</a> Excel spreadsheet (one tab for high school and a separate one for middle school if the district has a middle school athletics program). Compliance with Three-Part test will then be assessed.
Civil Rights	14.11	Annual Athletic Evaluation	<p>D. Describe the <i>process</i> the LEA uses to ensure that outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (What sequential step are taken? How and what documentation is kept as evidence this review process is used?)</p> <p><b>Resources on Booster Clubs and Donations</b></p> <ul style="list-style-type: none"> <li>· Guidelines: Prohibiting Discrimination (pages 52–53) <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/civil-rights-guidelines-state-policy">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/civil-rights-guidelines-state-policy</a>;</li> <li>· Athletic Budgets and Booster Clubs <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/budgetandboosterclubs.pdf">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/budgetandboosterclubs.pdf</a></li> <li>· Booster Clubs, Funding, School Sports, and Title IX (National Women’s Law Center) <a href="http://nwlc.org/resources/paying-playing-field-booster-clubs-funding-school-sports-and-title-ix/">http://nwlc.org/resources/paying-playing-field-booster-clubs-funding-school-sports-and-title-ix/</a></li> </ul>

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Juli Weishaar, CPR Contact, Odessa School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** readd@odessa.wednet.edu  
**CC:** weishaarj@odessa.wednet.edu; timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 Odessa School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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7/6/2021

TO: Dan Read, Superintendent  
Odessa School District

FROM: Sylvia Reyna, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**

**Evidence Needed** No evidence needed items found for this checklist.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
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Civil Rights	14.2	Nondiscrimination Statement	<p>Please provide for each of the following publications, a URL or indicate the page number where a complete, current nondiscrimination statement is located:</p> <p>A. Website, such as here: <a href="https://www.odessa.wednet.edu/">https://www.odessa.wednet.edu/</a></p> <p>E. CTE publication, announcement, or student recruitment materials. <i>Again, please clearly indicate if the district does not have a CTE program</i></p> <p>F. Online or ALE program publication, announcement, or recruitment materials. <i>Again, please clearly indicate if the district does not have an online or ALE program</i></p>
Civil Rights	14.4	Section 504	B. Provide a description noting the circumstances under which the district must conduct a manifestation determination meeting. (When is the district required to conduct a manifestation determination meeting?)
Civil Rights	14.6	English Language Development Services	A. The Home Language Survey (HLS) asks a number of questions. Answers to what two questions on the HLS determine whether a student should be screened to determine eligibility for EL services?"
Civil Rights	14.11	Annual Athletic Evaluation	<p>A. Describe the <i>process</i> (think sequential steps) for ensuring outside sources of athletic funding—including fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. Do the Athletic Director, Principal and Superintendent determine use of funds prior to distributing?</p> <p>Please share more about the following, as Annual Athletic Evaluation is conducted at the building level:</p> <p>MS Boys Total 53.06 MS Girls Total 1494.73</p>

cc:

Juli Weishaar, CPR Contact, Odessa School District

**Needs Work**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** readd@odessa.wednet.edu  
**CC:** weishaarj@odessa.wednet.edu; timothy.mcneely@k12.wa.us  
**Subject:** 2019-2020 Odessa School District Review Needs Work  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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8/19/2021

TO: Dan Read, Superintendent  
Odessa School District

FROM: Sylvia Reyna, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Please reply by September 8, 2021**

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
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Civil Rights	14.11	Annual Athletic Evaluation	<p>D. As part of ensuring outside sources of athletic funding do not result in disparities, the district writes, “The sports budget is equitably designated for each <u>sport</u>.” The district does not delineate between girls’ sports and boys’ sports. How are outside sources addressed?</p> <ul style="list-style-type: none"> <li>· Also, the district writes “The form must be signed by the Booster Club President, Coach making the request, the Athletic Director and the Principal.” What is the Athletic Director reviewing prior to signing (approving) the purchase request to ensure there are no disparities in use of funds between the girls and boys sports programs?</li> <li>· The district writes “The Athletic Director, Principal and Booster Club President meet in December and then in June of the same school year to review the totals of the purchase requests, keeping equity in mind.” The district does not mention what type of equity. Please explain.</li> <li>· Please explain how the district’s process to review for equity was considered regarding the following: MS Boys Total \$53.06 MS Girls Total \$1494.73</li> </ul>
Civil Rights	14.2	Nondiscrimination Statement	<p>A. The district's website only links to a document that contains the nondiscrimination statement. The statement should actually reside within the body of the webpage and not as a link to an external document. Please update your webpages to include the nondiscrimination statement as part of the district's webpage and provide the link where the nondiscrimination statement is posted.</p>
Civil Rights	14.4	Section 504	<p>B. As part of the district's manifestation determination process, please describe when the district <b>must</b> hold a manifestation determination meeting for a student eligible under Section 504?</p>

cc:

Juli Weishaar, CPR Contact, Odessa School District



**Final Approval Completed**

**From:** timothy.mcneely@k12.wa.us  
**To:** readd@odessa.wednet.edu  
**CC:** weishaarj@odessa.wednet.edu; Sylvia.Reyna@k12.wa.us;  
timothy.mcneely@k12.wa.us  
**Subject:** Final Approval for Odessa School District for Consolidated Program Review (CPR)  
2019-20  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200

k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

9/27/2021

TO: Dan Read, Superintendent  
Odessa School District

FROM: Timothy McNeely, Director

Consolidated Program Review & Rural Education

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 4/20/2021 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

cc:

Juli Weishaar, CPR Contact, Odessa School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** cdeska@lrschools.org; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Sylvia.Reyna@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Lind School District  
**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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11/8/2019

TO: Donald Vanderholm, Superintendent  
Lind School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your On-site, Full, review is 5/19/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **On-Site Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation from today, 11/8/2019, until two weeks prior to your review. OSPI team members will begin to review your documentation prior to coming on-site. During that time, individual OSPI program monitors *may* contact your LEA for clarification or further documentation. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

On the day of your review we will begin in the morning at 8:30 a.m. with a brief interactive dialogue between OSPI staff and key LEA program staff for approximately one (1) hour. For the morning meeting your LEA should include those individuals who oversee federal and state programs. The focus of this meeting is to talk about your LEA's goals and the use of your supplemental state and federal programs to meet those goals. *Throughout the review, it is important that LEA program staff be available to meet with OSPI staff regarding their programs.*

OSPI staff will then visit selected public and private schools (if applicable) to review individual programs. Monitors on-site will also connect with counterpart staff within your district to discuss program compliance requirements and provide technical assistance. Listed below are the public schools the team expects to visit. However, any school within your LEA is subject to possible review.

LIND-RITZVILLE HIGH SCHOOL

LIND ELEMENTARY SCHOOL  
LIND-RITZVILLE MIDDLE SCHOOL

An exit meeting will take place at approximately 4:00 p.m. on the closing day of your review, 5/19/2020, to present observations and review any noncompliant items.

#### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2020. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

#### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

#### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

#### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Cindy Deska, Special Programs Coordinator, Lind School District

**Review Schedule Updated**

**From:** timothy.mcneely@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** [cdeska@lrschools.org](mailto:cdeska@lrschools.org); [cdahl@lrschools.org](mailto:cdahl@lrschools.org); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us);  
[Sylvia.Reyna@k12.wa.us](mailto:Sylvia.Reyna@k12.wa.us)  
**Subject:** Consolidated Program Review (CPR) 2020-2021 Schedule Update - Lind School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/10/2020

TO: Donald Vanderholm, Superintendent  
Lind School District

FROM: Timothy McNeely, Director

Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2020-2021 Schedule Update

The date of your review has been updated. It is now scheduled for 5/18/2021. Please submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.

cc:

Cindy Deska, CPR Contact, Lind School District

Christina Dahl, Fiscal Contact, Lind School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us

**To:** dvanderholm@lrschools.org

**CC:** [cdeska@lrschools.org](mailto:cdeska@lrschools.org); [tschuler@lrschools.org](mailto:tschuler@lrschools.org); [Sylvia.Reyna@k12.wa.us](mailto:Sylvia.Reyna@k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us); [pat.smithson@k12.wa.us](mailto:pat.smithson@k12.wa.us); [sarah.albertson@k12.wa.us](mailto:sarah.albertson@k12.wa.us); [kasha.roseta@k12.wa.us](mailto:kasha.roseta@k12.wa.us); [Michaela.Miller@k12.wa.us](mailto:Michaela.Miller@k12.wa.us); [Rebecca.Wallace@k12.wa.us](mailto:Rebecca.Wallace@k12.wa.us); [Jody.hess@k12.wa.us](mailto:Jody.hess@k12.wa.us); [haley.lowe@k12.wa.us](mailto:haley.lowe@k12.wa.us); [kristin.hennessey@k12.wa.us](mailto:kristin.hennessey@k12.wa.us)

**Subject:** Consolidated Program Review (CPR) 2020-21 Follow-up Report - Lind School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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6/2/2021

TO: Donald Vanderholm, Superintendent  
Lind School District

FROM: Timothy McNeely, Director

Consolidated Program Review and Rural Education

RE: Consolidated Program Review (CPR) 2020-21 Report

On 6/1/2021, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 7/16/2021.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
3. Title I, C	The district has made great efforts to provide on-going professional learning to schools and district staff to understand the academic and support needs of migratory students. Thank you for your continued efforts.

**Technical Assistance**

Program	Technical Assistance Note
1. Title I, Part A	The LEA is encouraged to include a link on your webpage to the NAEP-State Comparisons page as this will be a CPR requirement beginning with 2020-21 reviews: <a href="https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N">https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N</a>
3. Title I, C	<p>3.7 - Parent Advisory Council - the district's program should ensure parents appointed to the advisory council to represent the academic and support needs of migratory students have an active Certificate of Eligibility at the time of appointments.</p> <p>3.8 - Academic Services - Having a guide of no less than 2/3's of the students served be program eligible is good guidance. However, the goal should be closer to a majority of the students served by Migrant Program funded staff be program eligible. If space remains once all eligible migratory students are identified for service, non-migratory students may be served if they have a similar need and it does not take away from the quality of services provided migratory students. Please do not hesitate to contact the program office should you have any questions regarding this guidance.</p>
10. Home	10.10 C. Your question regarding additional parent information; your website includes information in the 'resources' tab, and the resources you mentioned including SchoolHouse



mel ess	<p>Connection, etc. may be included as links on your website, distributed in a parent newsletter, or shared during Parent Open House sessions.</p> <p>I hope this information is helpful,</p> <p>-Sharon</p>
11.	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about highly identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the OSPI Learn Moodle link and go to <i>Highly Capable</i>. <a href="#">OSPI Learn Moodle</a> District may host the modules on your own website.</p> <p>Jody Hess will provide technical assistance with identification and services for students, as well as allowable uses for Highly Capable apportionment. <a href="mailto:Jody.Hess@k12.wa.us">Jody.Hess@k12.wa.us</a></p>
14.	<p><b>14.3.C/D: Sexual Harassment Policies/Procedures for Staff and Students.</b> With changes in federal Title IX rules regarding sexual harassment in August 2020, changes to sexual harassment policies/procedures is necessary. Although OSPI is not monitoring for these changes during the 2020-21 CPR cycle, districts should review OSPI's sexual harassment guidance for additional information. Note that while WSSDA's model policies for students (#3205/3205P) have been revised to align with both state and federal requirements, districts are encouraged to consult with WSSDA or their legal counsel regarding revisions to employee sexual harassment policies/procedures (WSSDA # 5011/5011P). <b>F: Employee Handbook.</b> The district is encouraged to update to the newest WSSDA sexual harassment policy/procedure for employees (5011/5011P).</p> <p><b>14.4: Section 504 Documentation.</b> OSPI has developed model Section 504 forms for districts to use, including manifestation determination meeting forms. They are available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/504-plans-and-students-disabilities">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/504-plans-and-students-disabilities</a> (scroll to Section 504 Sample Forms and Resources).</p> <p><b>14.8: Specialized Course and Program Enrollment Review.</b> Next year, the district is encouraged to review individual CTE courses separately, rather than an entire program as a whole (e.g., review the floral design class on its own, rather than as part of a review of all CTE courses together). This is because reviewing an individual course is more likely to uncover any course-specific enrollment disparities that could be masked during a program-wide review.</p> <p><b>?14.9: Student Discipline Review.</b> For smaller districts, small sample size can be a challenge. One possible solution is to continue to collect and analyze data each year (as required) but to</p>

then tackle a more comprehensive review every 3-4 years, to see if any trends emerge over time.

**14.10: Athletics Opportunities.** Download the sample survey results summary worksheet here: <https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/studentathleticinterestsurveyresultssummary.docx>. Download the required athletics opportunities tool and instructions here: <https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/athleticopportunities tool.zip>.

**14.11: Annual Athletic Evaluation.** Worksheets and additional information are available here: <https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/sex-equity-athletics>

**Action Plan(s) Approved**

Program	Number	Description
Title I, Part A	1.2	Title I, Part A Set-Asides
Highly Capable	11.1	Annual Public Announcement of ID Activity
Highly Capable	11.2	Identification Process & Consent
Highly Capable	11.3	Equitable Identification of Low-Income Students
Highly Capable	11.4	Criteria for Identification
Highly Capable	11.5	Program Services
Highly Capable	11.6	Program Evaluation

**Evidence Needed**

Program	Number	Description	Evidence
Title I, C	3.1	Identified Needs	Please submit an Action Plan describing the process the district will implement to submit a Fidelity of Strategy Implementation document reflecting efforts to implement

			strategies to address the academic supports to be paid with program funds.
Title III/TBIP	7.1	Identification	Please provide evidence for 7.1 a, 7.1 c, 7.1 d, 7.1 e Please reach out to Shannon Martin with any questions. 360-269-5232 shannon.martin@k12.wa.us
Title III/TBIP	7.3	Title III-Eligible Native American Students	Please provide evidence of 7.3 A. You are required to have these procedures in place to help identify possible eligible students, even if you don't have any currently enrolled students.
Title III/TBIP	7.7	Professional Development	Please complete an action plan describing the PD your staff will have access to in the coming year. The documents submitted are insufficient in meeting the criteria.
Title III/TBIP	7.9	Program Evaluation	Please provide evidence to meet the criteria for 7.9 g and 7.9 h.
Title III/TBIP	7.12	Bilingual Education	Please provide the evidence requested in 7.12 a
Title III/TBIP	7.13	TBIP Eligible Exited Students	Please provide evidence of services under 7.13 c
Rural Education	9.1	Identified Needs	A) The district needs to revise the narrative to include how providing professional development addressed a unique need of the district.
Civil Rights	14.1	Compliance Coordinators	B: Please submit evidence that the Title IX Coordinator has obtained training on sex equity in athletics. Please submit evidence the civil rights coordinator has received training sufficient to fulfill this role. Contact the Equity and Civil Rights Office for suggested resources to review.
Civil Rights	14.4	Section 504	Please submit: A. The LEA's notice to parents of Section 504 rights/procedural safeguards.

			<p>B. A description of the LEA’s manifestation determination process for Section 504 students.</p> <p>C. Section 504 file documentation, including the following:</p> <ol style="list-style-type: none"> <li>1. Parent consent for initial evaluation.</li> <li>2. Evaluation documentation.</li> <li>3. Parent consent for initial placement.</li> <li>4. Section 504 plans.</li> <li>5. Evidence of manifestation determination meetings (if applicable).</li> </ol> <p>If available, please submit the above documentation for two students at each level (elementary, middle, high). If unavailable, please indicate this in a note.</p>
Civil Rights	14.5	Interpretation and Translation Services	<p>B: Process. If the LEA has identified any LEP parents, please explain:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the LEA determines which language(s) to translate documents into.</li> <li>4. How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p>C: Staff interpreters/translators. If the district has any staff/employees who provide interpretation/translation services, please explain how the district ensures they are</p>

			qualified and competent, specifically, how they are trained in the following areas: confidentiality, the role and ethics of serving as an interpreter/translator, and knowledge of any specialized educational terms.
Civil Rights	14.11	Annual Athletic Evaluation	<p>A: Please submit a written description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p>D: Please specifically address how the evidence submitted takes sex equity into consideration and how the district ensures that outside sources of funding do not result in disparities favoring one sex over the other.</p>
Fiscal	15.2	Accounts Payable Charges	<p><b>Title II REAP</b></p> <p>1. 03/31/19 AP 1032919 SERVICE ALTERNATIVES 1101801244 RIGHT RESPONSE TRAINING INST 7797 03/13/19 809039 03/29/19 1,244.06</p> <p><b>Title IV REAP</b></p> <p>2. 11/30/18 AP 1113018 GOV CONNECTION INC 1101801183 CHROME BOOKS/CHARGING 56281321 10/30/18 808701 11/30/18 9,541.11</p> <p><b>Perkins</b></p> <p>3. 05/31/19 AP 1053119 AMAZON CAPITAL SERVICES 1101801277 CARL PERKINS GRANT 1WHY-K1Y9--PXMN 05/14/19 809157 05/31/19 803.88</p> <p>4. 08/30/19 AP 1083019 BMO MASTERCARD 1101801322 VINYL SIGN CLASSROOM SUPPLIES SO-D1068503 08/05/19 809356 08/31/19 3,779.84</p>
Fiscal	15.3	Payroll Charges	<p>1. JENNIFER ANDERSON October 2018</p> <p>2. TAMMY L STEINBERGER January 2019</p> <p>CHRISTINA GARZA-SAETRE May 2019</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Test Fee Reduction	5.1	Eligibility	No information given
Test Fee Reduction	5.2	Records	No information given
Test Fee Reduction	5.3	Exam Payment Process	No information given
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>A-B: Policies and procedures. The following policies and procedures are outdated: Nondiscrimination policy and procedure for students (3210/3210P) and for staff (5010/5010P). Please submit updated versions for review, along with anticipated board adoption dates, if board approval is required.</p> <p>E: Student handbooks. The information about sexual harassment and the discrimination complaint procedure is outdated. Please submit an action plan describing how the district will:</p> <ul style="list-style-type: none"> <li>• Notify students and parent about sexual harassment and the discrimination complaint procedure during the 2020-21 school year (e.g., email or flyer sent home, etc.), and</li> <li>• Include updated information about sexual harassment and the discrimination complaint procedure in future versions of its handbooks, beginning in the 2021-22 school year.</li> </ul> <p>Using OSPI's model handbook language is probably the most efficient way to ensure that the handbooks comply with this requirement. Model language available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-</a></p>

			<p><a href="#">outreach-materials</a>(scroll to "Annual Notices", "Sample Student Handbook Language").</p> <p>3/17: Nothing yet submitted. Please submit requested evidence</p> <p>H: Staff Training. Please provide the training materials or a summary of topics included in the civil rights training.</p>
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If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Cindy Deska, CPR Contact, Lind School District

Tina Schuler, Fiscal, Lind School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Final Approval Completed**

**From:** cpr@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** [cdeska@lrschools.org](mailto:cdeska@lrschools.org); [tschuler@lrschools.org](mailto:tschuler@lrschools.org); [Sylvia.Reyna@k12.wa.us](mailto:Sylvia.Reyna@k12.wa.us);  
[cpr@k12.wa.us](mailto:cpr@k12.wa.us)  
**Subject:** Final Approval for Lind School District for Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200

k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/8/2022

TO: Donald Vanderholm, Superintendent  
Lind School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 5/18/2021-6/1/2021 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

Note that a previous email was sent with additional information about evidence needed, or noncompliant items.

If you have any questions or concerns about the information provided in this report or if you need further assistance, please contact Jason Miller, Executive Director for Elementary Education, Early



Learning, Special Programs & Federal Accountability at [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us) or 360-764-6079.  
The agency TTY number is (360) 664-3631.

--

cc:

Cindy Deska, CPR Contact, Lind School District

Tina Schuler, Fiscal, Lind School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## Review Scheduled

**From:** timothy.mcneely@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** cdeska@lrschools.org; gayle.pauley@k12.wa.us; timothy.mcneely@k12.wa.us; Sylvia.Reyna@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2019-2020 Review Scheduled - Ritzville School District

**Attachments:** No attachments found for this message.



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## **SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/8/2019

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2019-2020 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2019-20 school year.

**The date for your On-site, Full, review is 5/19/2020. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as LAP, TBIP, and Highly Capable), Carl Perkins/Career and Technical

Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior year (2018-19), while the rest of the review covers current year (2019-20) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **On-Site Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation from today, 11/8/2019, until two weeks prior to your review. OSPI team members will begin to review your documentation prior to coming on-site. During that time, individual OSPI program monitors *may* contact your LEA for clarification or further documentation. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

On the day of your review we will begin in the morning at 8:30 a.m. with a brief interactive dialogue between OSPI staff and key LEA program staff for approximately one (1) hour. For the morning meeting your LEA should include those individuals who oversee federal and state programs. The focus of this meeting is to talk about your LEA's goals and the use of your supplemental state and federal programs to meet those goals. *Throughout the review, it is important that LEA program staff be available to meet with OSPI staff regarding their programs.*

OSPI staff will then visit selected public and private schools (if applicable) to review individual programs. Monitors on-site will also connect with counterpart staff within your district to discuss program compliance requirements and provide technical assistance. Listed below are the public schools the team expects to visit. However, any school within your LEA is subject to possible review.

RITZVILLE HIGH SCHOOL  
RITZVILLE GRADE SCHOOL  
LIND RITZVILLE MIDDLE SCHOOL

An exit meeting will take place at approximately 4:00 p.m. on the closing day of your review, 5/19/2020, to present observations and review any noncompliant items.

#### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2019-20 school year must be closed prior to October 1, 2020. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

#### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released October 2019. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

#### **About the Monitoring Cycle**

The CPR monitoring cycle this school year (2019-20) focuses on LEAs within Educational Service Districts (ESDs) 101 and 114. However, some LEAs are selected to participate in a CPR out of the regular monitoring cycle through an annual performance data review of potential risk. In addition, the four largest LEAs by federal program allocation are reviewed annually.

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

#### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Cindy Deska, Special Programs Coordinator, Ritzville School District

**Review Schedule Updated**

**From:** timothy.mcneely@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** [cdeska@lrschools.org](mailto:cdeska@lrschools.org); [dtelecky@lrschools.org](mailto:dtelecky@lrschools.org); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us); [Sylvia.Reyna@k12.wa.us](mailto:Sylvia.Reyna@k12.wa.us)  
**Subject:** Consolidated Program Review (CPR) 2020-2021 Schedule Update - Ritzville School District  
**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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11/10/2020

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Timothy McNeely, Director

Consolidated Program Review (CPR) & Rural Education

RE: Consolidated Program Review (CPR) 2020-2021 Schedule Update

The date of your review has been updated. It is now scheduled for 5/18/2021. Please submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.

cc:

Cindy Deska, CPR Contact, Ritzville School District

Dana Telecky, Fiscal Contact, Ritzville School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us

**To:** dvanderholm@lrschools.org

**CC:** cdeska@lrschools.org;dtelecky@lrschools.org; Sylvia.Reyna@k12.wa.us;  
timothy.mcneely@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us;  
kasha.roseta@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us;  
Jody.hess@k12.wa.us; haley.lowe@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2020-21 Follow-up Report - Ritzville School District

**Attachments:** No attachments found for this message.



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**SUPERINTENDENT OF PUBLIC INSTRUCTION**

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*Chris Reykdal* Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

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6/1/2021

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Timothy McNeely, Director

Consolidated Program Review and Rural Education

RE: Consolidated Program Review (CPR) 2020-21 Report

On 6/1/2021, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 7/16/2021.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)** N/A

**Technical Assistance**

Program	Technical Assistance Note
1. Title I Part A	<p>The LEA is encouraged to include a link on your webpage to the NAEP-State Comparisons page as this will be a CPR requirement beginning with 2020-21 reviews: <a href="https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N">https://www.nationsreportcard.gov/profiles/stateprofile/overview/WA?cti=PgTab_OT&amp;chort=1&amp;sub=MAT&amp;sj=WA&amp;fs=Grade&amp;st=MN&amp;year=2019R3&amp;sg=Gender%3A+Male+vs.+Female&amp;sgv=Difference&amp;ts=Single+Year&amp;tss=2015R3-2019R3&amp;sfj=N</a></p>
2. LA P	<p><b>2.3 A:</b> Monitoring program effectiveness is essential to ensure that programs are having the intended impact and meeting the needs of students being served, as well as to evaluate and provide intentional modifications to the services being provided. A thorough description is needed for evidence of program evaluation.</p> <p>This could include items such as weekly data meeting emails, agendas, and notes. In particular, information is needed on what data is used for decision making and adjustments made around which students are served and which are exited.</p> <p><b>Sample - English Language Arts:</b> The Learning and Teaching department coordinates quarterly meetings for LAP staff and literacy coaches to measure whether ELA interventions are being implemented as planned. To measure effectiveness of our programs, we start by looking at the students’ progress monitoring data. The literacy coaches also observe LAP staff and use an observational tool to provide feedback and improve implementation fidelity. This data is reviewed at our quarterly meetings. LAP staff also share effective practices and workshop problems of practice. We set clear milestones for student academic progress in order to make responsive changes to the content, environment, frequency, and duration when needed.</p> <p><b>Evidence in this example could include:</b></p> <ul style="list-style-type: none"> <li>• Student achievement data</li> <li>• LAP Tableau data</li> <li>• Observational tool data</li> <li>• Goals and modifications to improve outcomes for student groups</li> </ul>



<p>6. Titl e  II, Par t A</p>	<p>Item 6.1 - District is encouraged to continually monitor staffing updates for certification and endorsement matches and to ensure teachers who are placed out-of-field have been approved for the placement.</p> <p>Item 6.1 - LEAs are advised to update their student information systems by ensuring courses at all levels are linked to specific state course codes. Districts are encouraged to eliminate the use of WA0006 and WA0007 and instead use the state course code that best corresponds with the content of the course. This better prepares districts for federal and state reporting while reducing central office and/or registrar workload by eliminating manual course definitions in the EEDC tool.</p> <p>Item 6.3 - District is encouraged to have high school diplomas (or equivalent) and official test scores and college transcripts on file at the district office for all instructional paraeducators.</p>
<p>11. Hig hly Ca pa ble</p>	<p>We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's <i>Access and Equity/Pedagogies and Strategies for Highly Capable</i> modules is through the OSPI Moodle. Educators may self-register to open their own account and password. Click on the OSPI Learn Moodle link and go to <i>Highly Capable</i>. <a href="#">OSPI Learn Moodle</a> District may host the modules on your own website.</p> <p>Jody Hess will provide technical assistance with identification and services for students, as well as allowable uses for Highly Capable apportionment. <a href="mailto:Jody.Hess@k12.wa.us">Jody.Hess@k12.wa.us</a></p>
<p>14. Civ il Rig hts</p>	<p><b>14.2 (Policies/Procedures and Employee Handbooks):</b> With changes in federal Title IX rules regarding sexual harassment in August 2020, changes to sexual harassment policies/procedures is necessary. Although OSPI is not monitoring for these changes during the 2020-21 CPR cycle, districts should review OSPI's sexual harassment guidance for additional information. Note that while WSSDA's model policies for students (#3205/3205P) have been revised to align with both state and federal requirements, districts are encouraged to consult with WSSDA or their legal counsel regarding revisions to employee sexual harassment policies/procedures (WSSDA # 5011/5011P).</p> <p><b>14.4 (Section 504):</b> OSPI has developed model Section 504 forms for districts to use, including manifestation determination meeting forms. They are available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/504-plans-and-students-disabilities">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/504-plans-and-students-disabilities</a> (scroll to Section 504 Sample Forms and Resources).</p> <p><b>14.8 (Annual Course and Program Enrollment Data Review):</b> Next year, the district is encouraged to review individual courses separately, rather than as part of an entire program (e.g., review floral design class on its own, rather than as part of a review of all CTE courses</p>

together). This is because reviewing an individual course is more likely to uncover any disparities that could be masked during a program review.

**14.9 (Annual Student Discipline Data Review):** For small districts, small sample size can be a challenge. One possible solution is to continue to collect and analyze data each year (as required) but to then tackle a more comprehensive review every 3-4 years, to see if any trends emerge over time.

**14.10.C (3-Part Test for Athletics Equity):** Additional information about how to analyze each top-requested sport for compliance with Part 3 of the 3-Part Test is found at <https://www2.ed.gov/about/offices/list/ocr/docs/title9-qa-20100420.html> (see Q4 in particular).

**14.11 (Annual Athletic Evaluation):** The district is encouraged to more specifically document the reasons why the AD does not believe there are disparities based on sex. Evidence to back up this conclusion (e.g., written notes, meeting minutes, etc.) would be very helpful.

**Action Plan(s) Approved**

Program	Number	Description
Highly Capable	11.1	Annual Public Announcement of ID Activity
Highly Capable	11.2	Identification Process & Consent
Highly Capable	11.3	Equitable Identification of Low-Income Students
Highly Capable	11.4	Criteria for Identification
Highly Capable	11.5	Program Services
Highly Capable	11.6	Program Evaluation
Civil Rights	14.2	Nondiscrimination Statement

**Evidence Needed**

Program	Number	Description	Evidence
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Title II, Part A	6.1	Teacher Professional Qualifications	<p>Action Items:</p> <ol style="list-style-type: none"> <li>1. Please provide the information for Course Definitions to complete OTF review.</li> <li>2. Please provide responses to the action items identified in CPR Section 6.1 Determination <ul style="list-style-type: none"> <li>- Update course codes for WA0006 or provide board approval for the teachers listed at LRMS</li> <li>- Update start date of instruction or self-report to the Office of Professional Practice for teacher without valid certificate at Lind Elementary</li> </ul> </li> </ol>
Title II, Part A	6.2	Parents Right-to-Know	Please provide evidence of parent notification that Joneel Russel is operating on an Emergency Substitute Certificate for SY20-21 at Lind Elementary, a Title IA school.
Title II, Part A	6.3	Paraeducator Qualifications	Please provide evidence that at least one paraeducator from Lind/Ritzville meets the WA State Minimum Employment Requirements.
Title II, Part A	6.4	Teacher and Principal Evaluation and Growth	Please respond for Lind/Ritzville in this section for CPR Section 6.4 A-D.
Civil Rights	14.1	Compliance Coordinators	<p>B: Please submit evidence that the Title IX Coordinator has obtained training on sex equity in athletics. Please submit evidence the civil rights coordinator has received training sufficient to fulfill this role.</p> <p>Contact the Equity and Civil Rights Office for suggested resources to review.</p>
Civil Rights	14.4	Section 504	<p>Please submit:</p> <ol style="list-style-type: none"> <li>A. The LEA's notice to parents of Section 504 rights/procedural safeguards.</li> <li>B. A description of the LEA's manifestation determination process for Section 504 students.</li> <li>C. Section 504 file documentation, including the following: <ol style="list-style-type: none"> <li>1. Parent consent for initial evaluation.</li> </ol> </li> </ol>

			<ol style="list-style-type: none"> <li>2. Evaluation documentation.</li> <li>3. Parent consent for initial placement.</li> <li>4. Section 504 plans.</li> <li>5. Evidence of manifestation determination meetings (if applicable).</li> </ol> <p>If available, please submit the above documentation for two students at each level (elementary, middle, high). If unavailable, please indicate this in a note.</p>
Civil Rights	14.5	Interpretation and Translation Services	<p>B: If the LEA has identified any LEP parents, please explain:</p> <ol style="list-style-type: none"> <li>1. How the LEA determines when interpretation services are needed (e.g., how services are requested and the types of situations where interpretation services are typically provided).</li> <li>2. How the LEA determines which documents need to be translated (e.g., how translations are requested and what types of documents are typically translated).</li> <li>3. How the LEA determines which language(s) to translate documents into.</li> <li>4. How the LEA ensures its staff know how to access interpreters or translators to communicate with LEP parents.</li> </ol> <p>C: If the district has any staff/employees who provide interpretation/translation services, please explain how the district ensures they are qualified and competent, specifically, how they are trained in the following areas: confidentiality, the role and ethics of serving as an interpreter/translator, and knowledge of any specialized educational terms.</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A: Please submit a written description of the LEA's process for annually evaluating girls' and boys' athletic programs at each building to identify and address disparities based on each required factor.</p> <p>D: Please specifically address how the evidence submitted takes sex equity into consideration and how the district ensures that outside sources of funding do not result in disparities favoring one sex over the other. Additionally, the</p>

			action plan submitted appears to be from 2015, so updated evidence will be required.
Fiscal	15.1	Grant Claims and Expenditures	<p><b>15.1 C &amp; D</b></p> <p>Please pull Expenditure Summary and Detailed Expenditure report for the below grant. The report provided did not match what was charged to the grant. Documentation of what was charged to the grant has been uploaded below.</p> <p>Title II 0524664</p>
Fiscal	15.2	Accounts Payable Charges	<p>Please provided supporting documentation for these transactions. I list of supporting documentation can be found in "Fiscal Request Ritzville" document uploaded below.</p> <p><b>Title I</b></p> <p>1. 04/30/19 AP 10-0419 MATHRACK 1100019048 Student math rack 8705 04/09/19 69274 04/30/19 184.92</p> <p><b>Perkins</b></p> <p>2. 09/30/18 AP 10-0918 OXARC INC 0 5 TWC FABRICATOR 252i SYSTEM 30443165 09/10/18 68357 09/30/18 8,122.09</p>
Fiscal	15.3	Payroll Charges	<p><b>15.3 B.</b></p> <p>Provide a Payroll Distribution Report for 2018-19 from which OSPI will request supporting documentation for selected transaction. The report provided did not include salaries paid under grant 0524664.</p> <p>Please provide Time &amp; Effort and Payroll Recaps for the following:</p> <p>1. Jennifer Lynn Boness                                  December 2018</p> <p>2. Melody Miller    April 2019</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Test Fee Reduction	5.1	Eligibility	No information given

Test Fee Reduction	5.2	Records	No information given
Test Fee Reduction	5.3	Exam Payment Process	no information given
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>A-B: Policies and procedures. The following policies and procedures are outdated: Nondiscrimination policy and procedure for students (3210/3210P) and for staff (5010/5010P). Please submit updated versions for review, along with anticipated board adoption dates, if board approval is required.</p> <p>E: Student handbooks. The information about sexual harassment and the discrimination complaint procedure is outdated. Please submit an action plan describing how the district will:</p> <ul style="list-style-type: none"> <li>• Notify students and parent about sexual harassment and the discrimination complaint procedure during the 2020-21 school year (e.g., email or flyer sent home, etc.), and</li> <li>• Include updated information about sexual harassment and the discrimination complaint procedure in future versions of its handbooks, beginning in the 2021-22 school year.</li> </ul> <p>Using OSPI's model handbook language is probably the most efficient way to ensure that the handbooks comply with this requirement. Model language available here: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-outreach-materials">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/notification-requirements-staff-training-and-outreach-materials</a>(scroll to "Annual Notices", "Sample Student Handbook Language").</p> <p>3/17: Nothing yet submitted. Please submit requested evidence</p> <p>H: Staff Training. Please provide the training materials or a summary of topics included in the civil rights training,</p>

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Cindy Deska, CPR Contact, Ritzville School District

Dana Telecky, Fiscal Contact, Ritzville School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** cdeska@lrschools.org; cpr@k12.wa.us; jon.mishra@k12.wa.us;  
jason.miller@k12.wa.us  
**Subject:** 2019-2020 Ritzville School District Review Needs Work  
**Attachments:** No attachments found for this message.

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Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

3/23/2022

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Sylvia Reyna, Team Lead

RE: 2019-2020 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Your follow-up due date is 2 weeks from today.**



**Evidence Needed**

<b>Program</b>	<b>Number</b>	<b>Description</b>	<b>Evidence</b>
Fiscal	15.1	Grant Claims and Expenditures	<p><b>15.1 C &amp; D</b></p> <p>Please pull Expenditure Summary and Detailed Expenditure report for the below grant. The report provided on 3/8/22 did not match what was charged to the grant. Documentation of what was charged to the grant has been uploaded below - see page 3 of Grant Detail Report 1819</p> <p>Title II 0524664</p>
Fiscal	15.2	Accounts Payable Charges	<p>03/14/22 Please provided supporting documentation for these transactions. I list of supporting documentation can be found in "Fiscal Request Ritzville" document uploaded below.</p> <p><b>Title I</b></p> <p>1. 04/30/19 AP 10-0419 MATHRACK 1100019048 Student math rack 8705 04/09/19 69274 04/30/19 184.92</p> <p><b>Perkins</b></p> <p>2. 09/30/18 AP 10-0918 OXARC INC 0 5 TWC FABRICATOR 252i SYSTEM 30443165 09/10/18 68357 09/30/18 8,122.09</p>
Fiscal	15.3	Payroll Charges	<p><b>03/14/22</b></p> <p><b>15.3 B.</b></p> <p>Provide a Payroll Distribution Report for 2018-19 from which OSPI will request supporting documentation for selected transaction. The report provided did not include salaries paid under grant 0524664.</p> <p>Please provide Time &amp; Effort and Payroll Recaps for the following:</p> <p>1. Jennifer Lynn Boness                      December 2018</p> <p>2. Melody Miller                                      April 2019</p>
Civil Rights	14.1	Compliance Coordinators	<p>Please submit evidence the civil rights coordinator has received training sufficient to fulfill this role. Reviewing and signing the job description does not suffice.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	B2: 5010P. The district mistakenly uploaded 5011P instead of 5010P. Please upload 5010P for review.  H: Training. Please either list the subtopics covered in the civil rights portion of the training (so OSPI can verify it covered basic requirements) or attest that the civil rights portion covered at least the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and respond to discrimination, and (c) the LEA's discrimination complaint procedures.

cc:

Cindy Deska, CPR Contact, Ritzville School District

**Preliminary Compliance Report**

**From:** Sylvia.Reyna@k12.wa.us

**To:** dvanderholm@lrschools.org

**CC:** cdeska@lrschools.org; Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us; jody.hess@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; Jody.hess@k12.wa.us; kristin.hennessey@k12.wa.us; jon.mishra@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2019-20 Report - Ritzville School District

**Attachments:** No attachments found for this message.

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Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/22/2022

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Jason Miller, Executive Director, Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Consolidated Program Review (CPR) 2019-2020 Report

On February 28, 2022, our office emailed you a letter indicating all outstanding CPRs from 2018-19 and 2019-20 would close effective March 25. This is a follow up to that communication.

On 5/19/2020, a team from the Office of Superintendent of Public Instruction (OSPI) conducted a review of federal and state programs in which your Local Education Agency (LEA) participated.

The report below includes approved action plans, evidence needed, and noncompliant items. As noted in the February 28 communique, the evidence needed, and noncompliant items listed below will be considered as part of a risk assessment for identifying which LEAs to review in the 2022-23 review cycle.

This email serves as the final CPR report. The official review closure notification will be mailed to you soon.

**Action Plan(s) Approved**

Program	Number	Description
Highly Capable	11.1	Annual Public Announcement of ID Activity
Highly Capable	11.2	Identification Process & Consent
Highly Capable	11.3	Equitable Identification of Low-Income Students
Highly Capable	11.4	Criteria for Identification
Highly Capable	11.5	Program Services
Highly Capable	11.6	Program Evaluation
Civil Rights	14.2	Nondiscrimination Statement

**Evidence Needed**

Program	Number	Description	Evidence
Civil Rights	14.1	Compliance Coordinators	Please submit evidence the civil rights coordinator has received training sufficient to fulfill this role. Reviewing and signing the job description does not suffice.

**Noncompliant Items:**

Program	Number	Description	Actions Required
Fiscal	15.3	Payroll Charges	For the two employees in which time and effort was selected for review, the documentation provided was not adequate. The documentation was a monthly leave slip and/or a monthly

			<p>schedule. It did not include certain information required for time and effort, such as hours worked, programs charged, signature and date. It appears the two employees were charged to one federal program for the 2018-19 school year, therefore, the employees could have prepared a semi-annual certification. We recommend the District ensure adequate time and effort documentation is prepared for employees charged to federal programs. We will also provide the District with OSPI's time and effort bulletin and examples. Due to the timing of when the review needs to be closed, we will not ask for a corrective action plan from the District.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>B2: 5010P. The district mistakenly uploaded 5011P instead of 5010P. Please upload 5010P for review.</p> <p>H: Training. Please either list the subtopics covered in the civil rights portion of the training (so OSPI can verify it covered basic requirements) oral test that the civil rights portion covered at least the following: (a) protected classes under Washington state law, (b) employee responsibilities to report and respond to discrimination, and (c) the LEA's discrimination complaint procedures.</p>

If you have any questions or concerns about the information provided in this report or if you need further assistance, please contact Jason Miller, Executive Director for Elementary Education, Early Learning, Special Programs & Federal Accountability at [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us) or 360-764-6079. The agency TTY number is (360) 664-3631.

cc:

Cindy Deska, CPR Contact, Ritzville School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Final Approval Completed**

**From:** cpr@k12.wa.us  
**To:** dvanderholm@lrschools.org  
**CC:** cdeska@lrschools.org; Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us  
**Subject:** Final Notice for Ritzville School District for Consolidated Program Review (CPR) 2019-20  
**Attachments:** No attachments found for this message.

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/22/2022

TO: Donald Vanderholm, Superintendent  
Ritzville School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Approval for Consolidated Program Review (CPR) 2019-20

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 5/18/2021-6/1/2021 is closed. There are no further items to be addressed. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes for the remainder of the year.

cc:

Cindy Deska, CPR Contact, Ritzville School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

## **MOA CPR Program Monitor Reports 2021-2022**

The following LEAs received a CPR Program Monitor desk review that began during the 2021-2022 school year. They are listed in order of when the review began. The documentation for each LEA is bundled from start to finish.

- Toppenish School District
- La Conner School District

**Review Scheduled**

**From:** timothy.mcneely@k12.wa.us  
**To:** jcerna@toppenish.wednet.edu  
**CC:** Timothy.McNeely@k12.wa.us; Samantha.Diamond@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2021-2022 Review Scheduled - Toppenish School District

**Attachments:** No attachments found for this message.

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

11/2/2021

TO: John M. Cerna, Superintendent  
Toppenish School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR), Rural Education  
& 21st Century Community Learning Center Program (21st CCLC)

RE: Consolidated Program Review (CPR) 2021-2022 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2021-22 school year.

**The date for your Desk, Full, review is 2/8/2022. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as TBIP, and Highly Capable), Carl Perkins/Career and Technical



Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior years (2019-20 and 2020-21), while the rest of the review covers current year (2021-22) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary; e.g., if your LEA does not participate in a program listed for review.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/2/2021. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone or Zoom exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (2/8/2022). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written exit report will be provided prior to the exit meeting via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2021-22 school year must be closed prior to October 1, 2022. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released August 2021. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

Bulletin 048-21, July 1, 2021, included information regarding Consolidated Program Review (CPR) monitoring for school year 2021-22. Per page two of that bulletin, "In 2021–22, OSPI will work with LEAs with reviews still open from the 2019–20 and 2018–19 monitoring cycles. A select number of LEAs will receive an out-of-cycle CPR based on our annual risk assessment, as well as the four largest LEAs (as determined by federal fund allocation)."

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc: N/A

**Follow-up Report to District**

**From:** Sylvia.Reyna@k12.wa.us

**To:** jcerna@toppenish.wednet.edu

**CC:** tdmartin@toppenish.wednet.edu; Sylvia.Reyna@k12.wa.us; timothy.mcneely@k12.wa.us; pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us; Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; Jody.hess@k12.wa.us; kristin.hennessey@k12.wa.us; jon.mishra@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2021-22 Follow-up Report - Toppenish School District

**Attachments:** No attachments found for this message.

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

2/8/2022

TO: John M. Cerna, Superintendent  
Toppenish School District

FROM: Timothy McNeely, Director

Consolidated Program Review (CPR), Rural Education

& 21st Century Community Learning Center Program (21st CCLC)

RE: Consolidated Program Review (CPR) 2021-22 Report

On 2/8/2022, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 3/25/2022.

In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
7. Title III/TBIP	During a follow up conversation with the district, a description was provided of the training process which utilizes the same person to provide training and/or course work towards an endorsement who then also supports implementation via PLC meetings and job-embedded support in classrooms. No evidence of this process has been provided but this model as described is one that has strong merit and potential for significant impact on implementation of PD. This would align with the Federal expectation as well as best practices expectation for job-embedded, on-going training of sufficient duration to actually achieve improvements to instructional practices and to positively impact student outcomes.
15. Fiscal	District staff were great to work with. All documentation was submitted timely and there was great communication throughout the review. Thank you for all your hard work!
18. Title IV, Part A	18.3 - Technically this item is N/A due to the waiver for 20-21 fiscal requirements. I appreciated seeing the documentation and learning how the district has developed a system for tracking against the different program categories to ensure compliance.
19. Tribal Consultation	The Toppenish School District is to be commended for its practice of including the Tribal Liaison from the Yakama Nation Tribal Council Education Committee as a permanent agenda speaker at monthly school board meetings. Commendations to Lola Ceja, Indian Education Director, for exceeding her responsibilities of the Title VI program to support the continued required district-wide implementation, including the support of school and district administrators and educators across the district, of the <i>Since Time Immemorial</i> tribal sovereignty and history curriculum for ALL students within the district.

**Technical Assistance**

Program	Technical Assistance Note
3. Title I, Part C	MSA Online Services Report: In entries reviewed, it appears PFS students are only contacted once a month. It is highly recommended PFS students are contacted a minimum of once a week to ensure they are receiving services needed to succeed and achieve on-time high school graduation.
7. Title III/TBIP	Please change the SIS to distinguish students using the on-line Red Comet program from students registered through All NW Prep.
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Learn Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://learn.ospi.k12.wa.us/enrol/index.php?id=45">https://learn.ospi.k12.wa.us/enrol/index.php?id=45</a> . Districts may host the modules on your own website. For technical assistance, please contact us.
14. Civil Rights	<p><b>14.4 Section 504</b></p> <p>A. District submitted two documents for A. Neither Document "Disability Section 504.pdf" is</p> <p>OSPI's Info Sheet: "Students' Rights: Section 504 and Students with Disabilities." nor Document "disabilitysection504_english.pdf" (same document) can serve as the District's notice to parents of Section 504 rights/procedural safeguards. Again, this is an <i>OSPI Info Sheet about Section 504</i>.</p> <p>Above was concerning until reviewing new documentation submitted for 14.4.C. where I noticed sporadic use of a form called "<i>Parent/Student Rights in Identification, Evaluation, and Placement for Section 504</i>". The district should consistently provide this form (or the OSPI one above) moving forward when required to provide parent with the Section 504 Procedural Safeguards.</p> <p>As an aside, it is great to provide parents with the OSPI Info-Sheet about Section 504! (Parents will be better prepared to engage with the district regarding Section 504!) However, the Info-Sheet should be provided as an add-on, not instead of providing parents with a copy of the Procedural Safeguards when required.</p> <p><b>14.8 Course and Program Enrollment</b></p> <p>The district writes "The 'Student Discipline Proportionality Reports' generate a composite index score for each category (gender, race/ethnicity, and program). This</p>

index score identifies proportionality either as 1) Perfect 2) Mild 3) Significant or 4) Severe. The team will review each enrollment report, the composite index score for each sub groups, as well as the sample size of each sub group to determine whether disproportionalities exist.”

**Note:** Unlike for special education, significant disproportionality is not defined for this item. There is no expectation that findings be statistically significant. Instead, we are looking to ensure that districts are having at least annual data-based conversations about course and program enrollment to identify, and address where appropriate, potential disparities, specific to the following populations of students: 1) sex 2) race 3) ELL status 4) IEP status and 5) 504 status. Reviewing data trends over several years can also provide valuable insight.

**14.9 Student Discipline**

Please review TA provided for 14.8., above.

**14.12.C. (Training for Gender-Inclusive School Coordinator)**

The district’s upload for 14.12.C. indicates the Gender-Inclusive Schools Coordinator has attended one of OSPI’s Gender Inclusive Schools training. This training includes very valuable information about supporting gender diverse students at school, information about discriminatory harassment, as well as the discrimination complaint process under Chapter 392-190 WAC.

However, RCW [28A.642.080](#) (Transgender student policy and procedure) specifically requires that District Gender-Inclusive Schools Coordinators receive HIB training. As such, the Coordinator (District) is strongly encouraged to call the School Safety Center at OSPI to inquire about available training opportunities to meet this training requirement: 360-688-3375.

15. Fiscal	As a reminder, when using the sam.gov system to check a vendor’s suspension and debarment status, ensure the verification shows the date it took place.
18. Title IV, Part A	18.1 - During our phone call on 1-11-21, we discussed the challenges of a full process during the age of COVID. They will be pulling in more parents, students, and community voices to strengthen this element in future years.

**Action Plan(s) Approved**

Program	Number	Description
Title I, Part A	1.1	Ranking and Allocating

Title I, Part A	1.9	School Parent Family Engagement Policy/Plan
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment

**Evidence Needed**

Program	Number	Description	Evidence
Title I, Part C	3.3	Professional Learning	<p>A. Please submit an Action Plan designed in coordination with ESD 105 Migrant Education Program to provide training to ALL school personnel which focuses on understanding the migratory student lifestyle and migratory patterns of the LEA (Migrant 101) and strategies to address the identified needs (ELA, Math, Credit accrual/retrieval and non-instructional support)</p> <p>C. Please submit for training based on response to 3.3 B</p> <p>D. Please address prompt, based on response to 3.3 B</p>
Title II, Part A	6.1	Teacher Professional Qualification	There are a large number of teachers listed in the Educator Equity Data Collection (EE Tool) course definition tab. Please ensure your teachers' course codes are entered into your Student Information System (SIS). Once completed, please notify me so an accurate review of your out-of-field teachers can occur.
Title III/TBIP	7.1	Identification	Please provide evidence that initial notification of qualifying for services is provided to all parents. Provide evidence of the process for when parents request waivers and evidence of yearly follow up.
Title III/TBIP	7.2	Parent Notification	Same evidence as requested in 7.1.
Title III/TBIP	7.3	Title III-Eligible Native American Students	Please provide evidence of services for students who qualify under Title III. Please provide evidence that parents are contacted with the request to screen students for language support services.

Title III/TBIP	7.5	English Language Development Services	<p>Please provide the following: Evidence of language development instruction planned and provided (or overseen by) a qualified teacher for the elementary buildings. Include the instructional resources used for designated ELD. Please note that ELA ELD guides may only provide content access support. Please use the list of students we provided, and compile evidence of the type and amount of language development instruction provided to each student. Please provide schedules for the following students: 2634416600, 1109347914</p> <p>If evidence cannot be provided, then please create an action plan which details a pathway to meeting the dual obligation of designated language development and meaningful access to content for all identified M/ELs. Include any needed changes to staffing and services model, changes to instructional resources, a timeline, and the person(s) responsible for each step. You may use the OSPI provided template as desired which can be found on the CPR website.</p>
Title III/TBIP	7.6	Implementation of Title III Plan	Please provide evidence of the implementation of training. Please provide evidence of the use of funds as outlined in the Title III Grant application.
Title III/TBIP	7.7	Professional Development	Please provide evidence of participation in the trainings referenced. Please provide the evidence of the support for implementation of the trainings provided.
Title III/TBIP	7.9	Program Evaluation	Please provide evidence relative to the elements 7.9 A - G. If the evidence does not exist or these analyses are not typically conducted, please submit an action plan which outlines the process for evaluating the effectiveness of the programs and activities conducted using TBIP and Title III funds for each of the elements 7.9 A - G. Please include specific action steps, targeted completion dates, and persons responsible. The action plan template is available on the OSPI website for CPR.
Title III/TBIP	7.10	Parent Engagement	Please provide evidence of parent feedback and how that is incorporated into program improvements. If no such evidence exists, please create an action plan with details as to how this required action will be



			incorporated into the current systems and parent engagement activities. Include processes, timeline, who is responsible.
Title III/TBIP	7.13	TBIP Eligible Exited Students	Please provide roster of exited students receiving support by content area. Please provide evidence of the services provided to these students.
Homeless	10.4	LEA Liaison	For B: Please add a statement of attestation (linked under B. under "LEA Level.") - FTE may be sufficient but need the statement covering what the district is doing with the staff.
Homeless	10.8	Early Childhood	C: The child find notice does not mention students experiencing homelessness (housing instability, in transition, etc.). Please see the Child Find sample notice on the OSPI Homeless Ed website (available in multiple languages):  <a href="http://www.k12.wa.us">Resources for Homeless Children and Youth   OSPI (www.k12.wa.us)</a>
Foster Care	17.2	Collaboration with Local Child Welfare Agency	A) The district needs to provide the fully signed and executed interagency agreement with DCYF.  The submitted evidence is a contractor intake form and not the actual agreement.  C) Please provide evidence of ongoing communication between the district and DCYF from the current year.  The submitted evidence doesn't include dates or more specific information due to it being pasted into a Word document. Scanned versions of these emails would be better as evidence.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Civil Rights	14.10	Accommodating Student Interests	C. Toppenish Middle School Dance cannot be included when calculating Part One of

		and Abilities (Three-Part Test)	<p>the Three-Part Test. When Dance is removed as a sport for Toppenish MS, 25 additional opportunities for girls are needed to reach proportionality at this MS. The average team size for girls at this school is 19.</p> <p>Toppenish High School At Toppenish HS, 118 additional opportunities for girls are needed to reach proportionality at this MS. The average team size for girls at this school is 11. (This is a very big discrepancy!)</p> <p>Neither Toppenish Middle School or Toppenish High School has history and continuing practice of program expansion for girls (Part Two). Nor does evidence suggest that either school effectively accommodates the interests and abilities of girls (Part Three).</p> <p>For each school submit an action plan outlining the steps the district will take to equally accommodate the athletic interests and abilities of girls. Each plan should take into consideration girls' answers (summarized) on the respective school's most recent Student Athletic Interest Survey Summary. Schools, for example, can accommodate the unmet interests of girls by removing cut policies, expanding squad sizes, adding new sports or new squad levels.</p>
Fiscal	15.2	Accounts Payable Charges	<p><b><u>Procurement</u></b> Four purchases reviewed did not meet the noncompetitive procurement requirements. The following was identified:</p> <p>1. No justification was completed at the time of purchase to document the services were only available from a single source. [2 CFR 200.320(c)(2)]</p> <ul style="list-style-type: none"> <li>• SY 19-20 - Sasha M. Hilton - provided training and consulting for math teachers.</li> <li>• SY 20-21 - Pyramid PD - Professional development and support services for district.</li> </ul>

			<p>2. No justification was completed at the time of purchase to document the purchases were made due to the declared public emergency. [2 CFR 200.320(c)(3)]</p> <ul style="list-style-type: none"> <li>• SY 20-21 - BSN Sports, LLC - purchased face masks for students.</li> <li>• SY 20-21 - Capital Business Machines - purchase of six ultraviolet disinfecting lights for safety of students and staff.</li> </ul> <p>Corrective Action Required: Provide an action plan detailing how the district will ensure procurement methods will be followed moving forward.</p> <p>The district procured a contract with Ednetics, Inc. for the Erate network replacement. The original Request for Proposal was missing the following federal requirements for a formal procurement:</p> <ul style="list-style-type: none"> <li>• Cost price analysis conducted prior to soliciting. [2 CFR 200.324]</li> <li>• Advertisement in a newspaper [RCW 28A.335.190(1)]</li> <li>• Suspension and debarment clause [Appendix II to 2 CFR 200]</li> <li>• Byrd Anti-Lobbying clause [Appendix II to 2 CFR 200]</li> </ul> <p>Corrective Action Required: Provide an action plan detailing how the district will ensure all the federal requirements are completed as part of a formal procurement process.</p>
Fiscal	15.3	Payroll Charges	<p>Four employees signed Monthly Personnel Activity Reports attesting to charging their time to the same programs and hours each day. The district did not maintain a copy of the employee's schedule to validate the programs and hours charged. The employees are as follows:</p> <ul style="list-style-type: none"> <li>• Meliza Castaneda - March 2020</li> <li>• David Stiner - January 2020</li> </ul>

			<ul style="list-style-type: none"> <li>• Anastasia Sanchez - April 2021</li> <li>• Jose Eligio Jimenez-Gonzalez - October 2020</li> </ul> <p>Employees that work on multiple programs must complete time and effort monthly and those records should reflect the actual work done with all cost objectives clearly identified.</p> <p>Additional information can be seen in the Time &amp; Effort guidelines in the OSPI Addendum to Bulletin B-48-17. This has also been attached to the CPR tool in 15.3.</p> <p>Corrective Action Required: Provide an action plan detailing how the district will ensure compliance with time and effort guidelines moving forward.</p>
--	--	--	---

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Teri Martin, CPR Contact, Toppenish School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** Sylvia.Reyna@k12.wa.us  
**To:** jcerna@toppenish.wednet.edu  
**CC:** tdmartin@toppenish.wednet.edu; cpr@k12.wa.us  
**Subject:** 2021-2022 Toppenish School District Review Needs Work  
**Attachments:** No attachments found for this message.

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PO Box 47200  
Olympia, WA 98504-7200

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

4/22/2022

TO: John M. Cerna, Superintendent  
Toppenish School District

FROM: Sylvia Reyna, Team Lead

RE: 2021-2022 Review Needs Work

After reviewing the documentation you submitted for any Evidence Needed or Noncompliant items, we have found that one or more items need further follow-up. Please submit follow-up documentation and/or comments for the items below using the online Program Monitor application: <https://eds.ospi.k12.wa.us/ProgramMonitor>.

**Please respond by May 6, 2022.**

Should you have any questions regarding these items, you may contact the reviewer directly or I may assist in facilitating any questions.

**Evidence Needed**

Program	Number	Description	Evidence
Title II, Part A	6.1	Teacher Professional Qualification	Please see the 3/24/22 upload by C. Putaansuu regarding the steps that must be taken in the Educator Equity Data Collection in EDS. Note that these actions are required teacher no matter how the teacher is funded.
Foster Care	17.2	Collaboration with Local Child Welfare Agency	C) Please provide evidence of ongoing communication between the district and DCYF from the current year.  The submitted evidence doesn't include dates or more specific information due to it being pasted into a Word document. Scanned versions of these emails would be better as evidence.

**Noncompliant Item(s)**

No out-of-compliance items found for this checklist.

cc:

Teri Martin, CPR Contact, Toppenish School District

**Final Approval Completed**

**From:** cpr@k12.wa.us

**To:** jcerna@toppenish.wednet.edu

**CC:** tdmartin@toppenish.wednet.edu; Sylvia.Reyna@k12.wa.us; cpr@k12.wa.us

**Subject:** Final Approval for Toppenish School District for Consolidated Program Review (CPR) 2019-20

**Attachments:** No attachments found for this message.

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

6/29/2022

TO: John M. Cerna, Superintendent  
Toppenish School District

FROM: Jason Miller, Executive Director, Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Approval for Consolidated Program Review (CPR) 2021-22

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 2/8/2022-6/28/2022 is closed. There are no further items to be addressed in Program Monitor. Please continue the work implementing any approved action plans.

If you have any questions, please feel free to call me or any of the program monitors who assisted with your LEA's review.

Best wishes.

--

cc:

Teri Martin, CPR Contact, Toppenish School District

Sylvia Reyna, CPR Team Lead, Office of Superintendent of Public Instruction

**Review Scheduled**

**From:** timothy.mcneely@k12.wa.us  
**To:** wnelson@lc.k12.wa.us  
**CC:** [awheeler@lc.k12.wa.us](mailto:awheeler@lc.k12.wa.us); [bgianello@lc.k12.wa.us](mailto:bgianello@lc.k12.wa.us); [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us); Timothy.McNeely@k12.wa.us  
**Subject:** Consolidated Program Review (CPR) 2021-2022 Review Scheduled - La Conner School District  
**Attachments:** No attachments found for this message.

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Olympia, WA 98504-7200

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

11/5/2021

TO: Will Nelson, Superintendent  
La Conner School District

FROM: Timothy McNeely, Director  
Consolidated Program Review (CPR), Rural Education  
& 21st Century Community Learning Center Program (21st CCLC)

RE: Consolidated Program Review (CPR) 2021-2022 Review Scheduled

Your Local Educational Agency (LEA) has been scheduled by OSPI to participate in the Consolidated Program Review (CPR) process for the 2021-22 school year.

**The date for your Desk, Full, review is 3/10/2022. You may begin uploading documentation today, and must submit all documentation to OSPI no later than six (6) weeks prior to the start date of your review.**

A team of program monitors from OSPI will conduct a review of federal and state programs in



your LEA. Programs to be reviewed include most Elementary and Secondary Education Act (ESEA) federal programs, state programs (such as TBIP, and Highly Capable), Carl Perkins/Career and Technical Education (if applicable), McKinney-Vento/Homeless requirements, the Gun-Free Schools Act, and Civil Rights requirements. *Please note the fiscal portion of our checklist covers the prior years (2019-20 and 2020-21), while the rest of the review covers current year (2021-22) unless otherwise noted.*

OSPI will be using Program Monitor, a web application in the Education Data System (EDS), <https://eds.ospi.k12.wa.us/ProgramMonitor/> for the management of review content and as a replacement of the paper checklists used in the past. *Please take note of the programs listed for review in Program Monitor and inform OSPI of any potential discrepancies as necessary, e.g., if your LEA does not participate in a program listed for review.*

### **LEA Contacts**

If you have not already done so, please appoint one of your staff to be the designated point of contact for the review. This person will be responsible for coordinating the review. Please complete this [web form](#) to confirm your superintendent, designate a single point of contact for CPR for your LEA, a fiscal contact, and a civil rights program contact. Two weeks prior to the scheduled review, the review team leader from OSPI will call your identified CPR contact to finalize details for the day(s) of review.

Your LEA CPR contact, superintendent, fiscal and civil rights contacts will need access to the online Program Monitor Tool. *To get access, request the "ProgramMonitor\_Client" role from your Data Security Manager.* The list of managers can be found here: <https://eds.ospi.k12.wa.us/SecurityManagerList.aspx>.

### **Desk Reviews**

No later than six (6) weeks prior to your scheduled review, submit documentation for all programs using the online Program Monitor tool. You will be able to access the tool to upload documentation today, 11/5/2021. OSPI team members will begin to review your documentation prior to your review date. During that time, individual OSPI program monitors may contact your LEA for clarification or further documentation as necessary. Our goal is to actively reduce the number of noncompliant items LEAs may receive during a review.

Your LEA is encouraged to contact OSPI monitors for any technical assistance that may be of benefit to you during this review process.

Upon completion of the review, a team lead from OSPI will conduct a one to two-hour (1-2) phone or Zoom exit with your LEA's superintendent or designee, your CPR contact, and any staff your LEA may deem appropriate. Usually, the exit conversation takes place on the Friday after the review date indicated (3/10/2022). The team lead will contact your CPR contact approximately two (2) weeks prior to the start date to confirm the phone call time and date. We can reschedule the exit to early the next week if that is more convenient for the LEA. A written

exit report will be provided prior to the exit meeting via email and referenced during the exit call.

### **Follow-up Process**

Upon completion of the review, if there are noncompliant items or items that require further evidence to be provided, your LEA will have 45 calendar days from the date of the exit meeting to respond via the online Program Monitor tool. If further follow-up is required, your LEA will be notified and have two (2) weeks to respond. This cycle will continue as required. After all items have been reviewed and determined compliant or action plans accepted by OSPI staff, a final approval letter will follow to close the review.

Reviews during the 2021-22 school year must be closed prior to October 1, 2022. *Not meeting compliance deadlines or being unresponsive regarding compliance requirements could jeopardize federal funding and place your LEA in high-risk status. Additional conditions may be placed on your funds for an ongoing period of time.*

### **Program Monitoring Checklist**

Please disregard any copies of the CPR checklist prior to the version released August 2021. The current version may be found at <https://www.k12.wa.us/policy-funding/grants-grant-management/consolidated-program-review>.

### **About the Monitoring Cycle**

Bulletin 048-21, July 1, 2021, included information regarding Consolidated Program Review (CPR) monitoring for school year 2021-22. Per page two of that bulletin, "In 2021–22, OSPI will work with LEAs with reviews still open from the 2019–20 and 2018–19 monitoring cycles. A select number of LEAs will receive an out-of-cycle CPR based on our annual risk assessment, as well as the four largest LEAs (as determined by federal fund allocation)."

The Office of Superintendent of Public Instruction (OSPI) monitors multiple state and federally funded programs under the Elementary and Secondary Education Act (ESEA) as required by federal regulations (2 CFR 200).

### **Questions & Contact Info**

If you have questions, please call Timothy McNeely at (360) 725-6234 or email at [timothy.mcneely@k12.wa.us](mailto:timothy.mcneely@k12.wa.us).

For more information regarding the CPR process, please refer to the [CPR webpage](#) on the OSPI website.

Thank you.

cc:

Andy Wheeler, CPR Contact, La Conner School District

Brian Gianello, Fiscal Contact, La Conner School District

**Follow-Up Report to District**

**From:** Jason.miller@k12.wa.us

**To:** wnelson@lc.k12.wa.us

**CC:** awheeler@lc.k12.wa.us; bgianello@lc.k12.wa.us; cpr@k12.wa.us;  
pat.smithson@k12.wa.us; sarah.albertson@k12.wa.us; kasha.roseta@k12.wa.us;  
Michaela.Miller@k12.wa.us; Rebecca.Wallace@k12.wa.us; Jody.hess@k12.wa.us;  
kristin.hennessey@k12.wa.us; jon.mishra@k12.wa.us

**Subject:** Consolidated Program Review (CPR) 2021-22 Follow-up Report - La Conner School District

**Attachments:** No attachments found for this message.

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

3/25/2022

TO: Will Nelson, Superintendent  
La Conner School District

FROM: Jason Miller, Executive Director, Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Consolidated Program Review (CPR) 2021-22 Report

On 3/10/2022, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

This report includes commendations, technical assistance, evidence needed, noncompliant items and actions required.

Your district has 45 calendar days from the date of the exit review to follow up with any action that is required for noncompliant items or evidence needed. Your follow-up due date is 5/13/2022. In the short term, please prioritize Evidence Needed requests and inform the CPR team lead and

program staff when you respond to these items. Your additional documentation will clarify your compliance standing.

**Commendation(s)**

Program	Commendation Note
3. Title I, Part C	The LEAs efforts to ensure recruiting is conducted in a timely manner is appreciated. The recruiter is very good about reaching out to their Migrant Education Program partners in Sunnyside to seek assistance and support when needed to ensure migratory students are identified and enrolled in the program within the recommended time frame.
19. Tribal Consultation	19.2 - The La Conner School District is to be commended for its ongoing support of students and staff to participate in the Native Voices Arts Academy project.

**Technical Assistance**

Program	Technical Assistance Note
1. Title I, Part A	Item 1.2 I have accepted the description and the evidence, however, if an auditor asks for the Homeless Set Aside expenditure report or accounting, your local record must show the original amount budgeted as planned in your needs assessment in FP 201.
3. Title I, Part C	<p>3.1 The program staff should continue to strengthen their Parent Advisory Council planning, implementation, and evaluation process to ensure continued efforts to align services to be provided under the Migrant Education Program.</p> <p>3.3 Please ensure staffing sign-in sheets are gathered at each professional learning opportunity for staff to learn more about the migratory student population in the district.</p> <p>3.5 The records clerk is encouraged to contact the Migrant Student Data, Recruitment, and Support program office in Sunnyside anytime they have questions or need assistance with reporting any of the migratory student components.</p>
7. Title III/TBIP	7.1 A - Revise the ELL Student ID Process document to reflect the process for identifying potential ELs. Current document refers to AI/AN students, which follow different procedures. Refer to Washington State Multilingual/English Learners Policies and Practices Guide for guidance if needed.

	7.2 - Revise parent notification letters to include student name and school. Refer to OSPI templates found on the Multilingual Education Family Communication page: <a href="https://www.k12.wa.us/multilingual-family-communication-templates">Multilingual Family Communication Templates   OSPI (www.k12.wa.us)</a>
11. Highly Capable	We are glad to help districts move forward to improve Highly Capable procedures and services. OSPI has created a series of 10 online professional learning modules about identification and services for Highly Capable students. This technical assistance resource is available at no cost for teachers and administrators to use at any time. Access to OSPI's Access and Equity/Pedagogies and Strategies for Highly Capable modules is through the OSPI Learn Moodle. Educators may self-register to open their own account and password. Click on the Moodle link and go to Highly Capable. <a href="https://learn.ospi.k12.wa.us/enrol/index.php?id=45">https://learn.ospi.k12.wa.us/enrol/index.php?id=45</a> . Districts may host the modules on your own website. For technical assistance, please contact us.
14. Civil Rights	<b>14.2 Nondiscrimination Statement</b> District should make sure to use current name and contact information in nondiscrimination statements. (Same staff member has had all three Coordinator roles since last CPR review. (Job announcement uploaded for 14.2.D. should be updated to include correct Coordinator information.)
15. Fiscal	<b>Policy 6220</b> has been updated by WSSDA as of December 2021. The new update includes self-certification information and an Interlocal Cooperation section
19. Tribal Consultation	19.1 - Data Analysis: Has the district received request from the Swinomish Tribe to enter into a data sharing agreement? Is the data analysis for tribal consultation based upon maximum identification of all three categories of AIAN learners (AIAN non-Hispanic, AIAN Hispanic, AIAN Two or more races) or just the federal race category (AIAN non-Hispanic)? Might data analysis also include first and second-generation tribal descendants (Title VI criteria)?  19.2 - Instructional resources for classroom educators have continued to grow in the past couple of years. In support of the district's social studies adoption cycle and its requirement per RCW 28A.320.170 to integrate the <i>Since Time Immemorial</i> curriculum into all social studies and history courses K-12, the Office of Native Education offers free introductory and intermediate webinars through spring 2022. <a href="https://www.k12.wa.us/sites/default/files/public/indianed/tribalsovereignty/training/Save%20the%20Date--STI%20Training%20Webinars--Spring2022%20-%20Final.pdf">https://www.k12.wa.us/sites/default/files/public/indianed/tribalsovereignty/training/Save%20the%20Date--STI%20Training%20Webinars--Spring2022%20-%20Final.pdf</a>

**Action Plan(s) Approved** No "action plan approved" items found for this checklist.

**Evidence Needed**

Program Number	Description	Evidence
Title I, Part C 3.1	Identified Needs	D. Please describe how staff are informed of the services eligible migratory students may receive from the Migrant Education Program that is in alignment with the approved grant application for 2020-21.
Title II, Part A 6.1	Teacher Professional Qualification	Please see the document uploaded on 1/20/22 for the actions needed. Note that this requirement is for all teachers, not only teachers in Title IA schools or teachers funding by Title IIA.
Homeless 10.4	LEA Liaison	B: The attestation says the FTE for the homeless liaison is .03. The Title I Application (see 10.11 below) says the FTE for the liaison is .05. Which is correct (please correct the attestation if it is wrong).
Homeless 10.5	Identification of Students	A: Completed forms - filled out - are required (templates are not sufficient).
Homeless 10.9	Community Collaboration	A: The evidence is the type of evidence needed but it shows very limited contact (all at once). Please upload similar evidence for different times of the year or any other evidence you have (agendas for meetings with groups, presentations the district has given, meetings minutes, etc.).
Homeless 10.10	Posting of Right	B: Please upload a picture of the location where your NCHE parent brochures are available in your school buildings.

les s		s and Pare nt Infor mati on	
Fis cal	15 .1	Gran t Clai ms and Expe nditu res	<p>2019-20</p> <p><b>15.1 C</b>– Expenditure Summary Reports for the below grants do not match OSPI Grant Reports (OSPI Grant Reports uploaded under 15.1). Please explain.</p> <p><b>Title I Target 0270812</b></p> <p><b>Migrant Summer 0290949</b></p> <p>2020-21</p> <p><b>15.1 C</b>– Expenditure Summary Reports for the below grants do not match OSPI Grant Reports (OSPI Grant Reports uploaded under 15.1). Please explain.</p> <p>Migrant Ed 0282516</p> <p>Title IV 0430886</p> <p>Title III 0402886</p> <p>ESSER II 0120390</p>
Fis cal	15 .2	Acco unts Paya ble Char ges	<p><b>2019-20</b></p> <p>Transaction support documentation is needed for the following transactions. See uploaded Fiscal Request La Conner 2019-2020 under 15.2</p> <p><b>Title I</b></p> <p>1. 07/31/20 IN 073120MH BUSINESS CARD FKA B OF A 1112019102 JOYFUL LITERACY GROUP REGISTRATION, 6-10 GROUP SIZE. REGISTRATION FOR: KATIE WIGAL, JUDY ZIMMERMAN, MICHELLE AVILA, LISA HEDLUND, NIKKI CECONI, BECKY SWANSON, HEIDI PALMGREN, ASHTON TVETER, KELLY JUNGQUIST, AND REBEKAH MCGAUGHEY 03242TG 06/23/20 427349 07/31/20 \$741.51</p> <p><b>Title I, Target</b></p> <p>2. 04/30/20 IN 043020MH AMAZON 1112019092 JOYFUL LITERACY INTERVENTIONS (8 COPIES) 434493499989 03/25/20 426717 04/30/20 \$518.48</p> <p><b>Title II</b> Provide documentation supporting the original charge</p>



3. 05/31/20 JE GF0520C TITLE II (5200) CORRECTIONS CORRECT ACCT CODE 06/10/20 \$3,547.07
4. 11/15/19 IN 111519MH WHITEY'S BBQ & CATERING 5112019069 NOVEMBER 1, 2019, LUNCH FOR PROFESSIONAL DEVELOPMENT DAY #1 150PPL @ 13.82 PER PERSON 188 11/01/19 425902 11/15/19 \$2,249.21
5. 03/31/20 IN 033120MH CHARACTER STRONG EDUCATOR PD HALF DAY SPEAKING FEE, 2/18/2020 4936 02/18/20 426563 03/31/20 \$1,500.00

**Title IV**

6. 03/31/20 IN 033120MH CHARACTER STRONG EDUCATOR PD HALF DAY SPEAKING FEE, 2/18/2020 4936 02/18/20 426563 03/31/20 \$1,500.00

**Migrant**

7. 03/31/20 IN 033120MH BUSINESS CARD FKA B OF A 2112019073 2020 NATIONAL MIGRANT EDUCATION CONFERENCE REGISTRATION FOR HEIDI DARLING 47772958 03/04/20 426559 03/31/20 \$415.00

**2020-21**

Transaction support documentation is needed for the following transactions. See uploaded Fiscal Request La Conner 2020-2021 under 15.2

**ESSER I**

1. 03/09/21 IN 031221JE AMAZON 7122020016 12X THERMOMETERS AND 1X RECHARGEABLE BATTERIES, 1X STICKERS 467376977967 02/10/21 428275 03/12/21 \$428.30
2. 03/25/21 IN 032521JE MACGILL DISCOUNT NURSE SUPPLY 7122020022 200 PACKS OF ALCOHOL WIPES IN0750483 02/23/21 428352 03/25/21 \$792.00
3. 04/27/21 IN 043021JE AMAZON 5022020023 MICROPHONES FOR HYBRID/REMOTE SIMULTANEOUS TEACHING (COVID) 593439777838 03/23/21 428489 04/30/21 \$2,443.18
4. 03/09/21 IN 031221JE MICRO K12 5022020018 BAGS FOR COMPUTERS 0517943 02/17/21 428299 03/12/21 \$1,820.20 Please provide documentation for the original purchase
5. 09/30/20 IN 093020MH BUSINESS CARD FKA B OF A 2002020018 POSITIVEPROMOTIONS.COM, SLING BACKPACKS FOR BRAVES DAY 24527805 09/01/20 427596 09/30/20 \$1,383.03

**ESSER II**

6. 05/11/21 IN 051421JE APPLE INC 1112020083 KINDERGARTEN IPADS (5 ADDITIONAL) AE42597569 04/16/21 428577 05/14/21 \$1,622.08 Please provide documentation for the original purchase

7. 08/31/21 IN 101421JE ATS AUTOMATION INC. 7002020049 ELEMENTARY HVAC: ESCO PROFESSIONAL SERVICES, MEASUREMENT AND VERIFICATION 2021-139 G (1-1) 08/24/21 429315 10/14/21 \$70,743.29

**Title I**

8. 02/25/21 IN 022521JE ABEO SCHOOL CHANGE, LLC. 1112020057 ABEO CONSULTING 20-21 SCHOOL YEAR WA311-221 02/04/21 428201 02/25/21 \$7,200.00

**Title I Target**

9. 02/25/21 IN 022521JE ABEO SCHOOL CHANGE, LLC. 1112020057 ABEO CONSULTING 20-21 SCHOOL YEAR WA311-221 02/04/21 428201 02/25/21 \$7,200.00

**Title II**

10. 05/25/21 IN 052821JE BUSINESS CARD FKA B OF A 5112020040 ANNUAL PLC CONFERENCE REGISTRATION IN LAS VEGAS 9/27- 28/21 FOR KATHY HERRERA, CHRISTINE TRIPP, HEATHER FAKKEMA, ANDY WHEELER, WILL NELSON. \$475.00 PER PERSON ANNPLC042821 04/28/21 428640 05/28/21 \$898.00

**Title III**

11. 07/27/21 IN 072721JE THE LANGUAGE EXCHANGE 7112020090 SUMMER SCHOOL PERMISSION SLIPS AND REPORT CARDS P1514 07/15/21 428969 07/27/21 \$1,299.76

**Title IV**

12. 06/30/21 IN 063021JE PITSCO 7112020073 SUMMER SCHOOL SUPPLIES (FLYERS CLUB) 21-000005162 06/18/21 428832 06/30/21 \$569.23 Please provide documentation for the original purchase

**Migrant**

13. 06/30/21 IN 063021JE NATIONAL INVENTORS' HALL OF FAME 7112020069 SUMMER SCHOOL INVENTORS CAMP 1807940 05/28/21 428823 06/30/21 \$5,200.00

Fiscal	15.3	Payroll Charges	<p><b>2019-20</b></p> <p>Time and Effort support documentation is needed for the following employees. See uploaded Fiscal Request La Conner 2019-2020 under 15.3</p> <ol style="list-style-type: none"> <li>1. Linda J Sovie August 2020</li> <li>2. Mandi Barnett February 2020</li> <li>3. Heidi June Darling October 2019</li> <li>4. Rebecca M Swanson September 2020</li> <li>5. Naomi Lynn Williams October 2019</li> <li>6. Kimberly Chase March 2020</li> <li>7. Stacy Silver May 2020</li> </ol> <p><b>2020-21</b></p> <p>Time and Effort support documentation is needed for the following employees. See uploaded Fiscal Request La Conner 2020-2021 under 15.3</p> <ol style="list-style-type: none"> <li>1. Lauren Weatherford April 2021</li> <li>2. Bette Johnson May 2021</li> <li>3. Olympia Zuniga January 2021</li> <li>4. Lindsay Osborn January 2021</li> <li>5. Mandi Barnett November 2020</li> <li>6. Heidi June Darling April 2021</li> <li>7. Nikki Cecconi October 2020</li> <li>8. Patricia Lou Webber April 2021</li> </ol>
Title III/TBIP	7.2	Parent Notification	Provide evidence of parent notification of initial placement and/or continued eligibility. Copies of letters provided from La Conner School District did not have student names or identifying information.
Title III/Deve	7.5	English Language	<p>Please provide evidence of School Board Approval for TBIP Plan.</p> <p>Provide evidence of services implemented by grade and English proficiency level at each school.</p>

TBIP		Implementation Services	If evidence cannot be provided, create an action plan which details a timeline for board approval as well as description of services that meet the dual obligation of designated English language development and meaningful access to content for all identified TBIP and Title III students. You may use the OSPI provided template as desired which can be found on the CPR website.
Title III/TBIP	7.6	Implementation of Title III Plan	District has not provided evidence of the implementation of the Title III services as outlined in the grant application. If no such evidence exists, please provide an action plan which indicates how Title III funds will be used to provide supplementary support for the language program. This plan should address professional learning, family engagement, coaching, extended day and/or extended year services, as outlined in the allowable activities for the use of these funds.
Title III/TBIP	7.10	Parent Engagement	<p>Please provide evidence of parent feedback/input and how the feedback is incorporated into program improvements. If no such evidence exists, please create an action plan which outlines how parent feedback/input will be elicited and incorporated into program improvement planning.</p> <p>Please provide evidence of parent feedback/input and how the feedback is incorporated into program improvement planning.</p> <p>Please provide evidence of parent feedback/input and how the feedback is incorporated into program improvement planning.</p> <p>Please provide evidence of parent feedback/input and how the feedback is incorporated into program improvement planning.</p>

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Perkins-CTE	12.2	State CTE Approval/Frameworks	A. Please provide Program Approval Signature Pages for Family and Consumer Science, Skilled and Technical Science, Business and Marketing, and STEM.
Perkins-CTE	12.3	Community and Educational Partnerships	C. The program evaluations submitted for Family and Consumer Sciences and STEM do not have CTE Director and Advisory Chair signatures or dates.

		and Program Evaluation	
Perkins-CTE	12.5	Professional Development/CTE Personnel	<p>C. Please provide evidence the instructors teaching STEM and STS hold current CTE certificates to teach the classes.</p> <p>D. If you have any conditionally certified instructors, please provide proof of written training plans.</p>
Perkins-CTE	12.6	Leadership, Employability, and Extended Learning Opportunities	<p>A. Please provide the equivalency leadership program documentation indicating the Brava Bakery relates to the culinary trade and eSports to IT and video game design, along with the instructors assigned to each.</p> <p>B. LEA provided invoice for professional membership to SkillsUSA. Just showing one paid membership.</p> <p>Note indicates: Professional Memberships to Skills USA. All instructors are professional members including principal at \$28 each. Need clarification.</p> <p>C. and D. Discuss Action Plan.</p>
Civil Rights	14.3	Complaint Procedures: Discrimination and Sexual Harassment	<p>B. District's plan to (promptly) adopt WSSDA's most recent 5010P is accepted.</p> <p>H. Submit an action plan describing how the district will ensure all administrators and certificated and classroom personnel will receive training about civil rights compliance and the district's discrimination complaint process this school year. Please indicate if the LEA will use the OSPI Sample Staff Training Slide Deck. If the LEA does not plan on using the OSPI sample slide deck, provide an outline of the training the LEA will conduct. (Minimal training components include information about Washington's protected classes, forms of discrimination, recognizing different forms of discrimination, how staff must respond to allegations of discrimination, and the district's discrimination complaint procedure—WSSDA's 3210/P or equivalent). Please specify who will provide the training, when the training will take place, and how the district will document that all administrators and certificated and classroom personnel will receive training (sign-in sheets are typical).</p>

Civil Rights	14.8	Course and Program Enrollment	<p>A. Please provide further detail:</p> <ol style="list-style-type: none"> <li>1. Who, by title, maintains the record of each annual review (so that past reviews are incorporated into current reviews)?</li> <li>2. How are the reviews documented? (For example: In what format is data shared with review team? How does the LEA preserve its analysis of the reports? How does the LEA record its plans to respond to the identified disproportionalities?)</li> <li>3. How does the district determine if a disparity is significant?</li> </ol>
Civil Rights	14.9	Student Discipline	<p>A. Please provide further detail:</p> <ol style="list-style-type: none"> <li>1. Who, by title, maintains the record of each annual review (so that past reviews are incorporated into current reviews)?</li> <li>2. How are the reviews documented? (For example: In what format is data shared with review team? How does the LEA preserve its analysis of the reports? How does the LEA record its plans to respond to the identified disproportionalities?)</li> <li>3. How does the district determine if a disparity is significant?</li> </ol> <p><b>Resources and Tools on Student Discipline</b> Please see 14.9 School Discipline at: <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p>
Civil Rights	14.10	Accommodating Student Interests and Abilities (Three-Part Test)	<p>A. The District did not use the correct (OSPI) Student Athletic Interest Survey. Nor did the District seek approval from OSPI to modify the survey before administering (WAC 392-190-040). Administer the OSPI Student Athletic Interest Survey at the middle school and at the high school. The correct survey can be found at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/sex-equity-athletics">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/sex-equity-athletics</a> under “Student Athletic Interest Survey” (Step 1).</p> <p>B. Upload the athletic interest survey results for the high school and (separately) for the middle/junior high school. The answers to <i>each survey question</i> must be disaggregated by sex and building. (The survey results the district uploaded do not meet compliance.</p>

			<p>Document consists of raw data, not a summary of survey results disaggregated by sex).</p> <p>Summary of results should include, at minimum:</p> <ol style="list-style-type: none"> <li>1. The number of students surveyed by gender.</li> <li>2. The number of students enrolled (eligible to take the survey) by gender.</li> <li>3. The top sports requested, including the number of students who expressed interest in each sport for each gender.</li> <li>4. The top reasons for non-participation for each gender</li> </ol> <p><b>Note:</b> The <i>easiest</i> method for meeting 14.10B requirements is to use the "Student Athletic Interest Survey: Results Worksheet (Word)" found under 14.10 located at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/consolidated-program-review-civil-rights</a></p> <p>C. Compliance with the Three-Part Test will be assessed once district work for "A" and "B" are complete and uploaded to the tool.</p>
Civil Rights	14.11	Annual Athletic Evaluation	<p>A. Describe the <i>process</i> the LEA uses annually to evaluate girls' and boys' athletic programs at each building to identify and address disparities based on each required factor. ("A" is description of process, while "B" requires evidence that documents the use of process described for "A.")</p> <p><b>Tools to Assist in Meeting Annual Evaluation Requirement</b></p> <p>See "Team, Building, &amp; District Worksheet Samples" at <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/sex-equity-athletics">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/resources-school-districts-civil-rights-washington-schools/sex-equity-athletics</a>.</p> <p>B. Upload evidence that the above process was implemented for the 2018–19 or 2019–2020 school year. Evidence must include dated and completed building-level worksheets and analysis, or equivalent.</p> <p>C. If the athletic evaluation for the 2018–2019 or 2019–2020 school year identified disparities that favor one sex at any building, upload evidence that the LEA or building is taking effective steps to</p>

			<p>correct the disparity. If no disparities were identified, please describe grounds for N/A determination.</p> <p>D. Describe the process the LEA uses to ensure that outside sources of athletic funding (money to support athletics)—including from fundraisers, donations, and booster club activities—do not result in disparities that favor one sex over another. (What sequential step are taken? How and what documentation is kept as evidence this review process is used?) (NOTE: Expectation of equal <b>benefit</b> between the girls’ and boys’ programs may not always mean equal distribution of funding between the girls’ and boys’ programs.)</p> <p><b>Resources on Booster Clubs and Donations</b></p> <ul style="list-style-type: none"> <li>· Guidelines: Prohibiting Discrimination (pages 52–53) <a href="https://www.k12.wa.us/policy-funding/equity-and-civil-rights/civil-rights-guidelines-state-policy">https://www.k12.wa.us/policy-funding/equity-and-civil-rights/civil-rights-guidelines-state-policy</a>;</li> <li>· Athletic Budgets and Booster Clubs <a href="https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/budgetandboosterclubs.pdf">https://www.k12.wa.us/sites/default/files/public/equity/pubdocs/budgetandboosterclubs.pdf</a></li> <li>· Paying for the Playing Field: Booster Clubs, Funding, School Sports, and Title IX (National Women's Law Center) <a href="https://www.nwlc.org/wp-content/uploads/2015/08/booster_myths_final_5.26.11.pdf">https://www.nwlc.org/wp-content/uploads/2015/08/booster_myths_final_5.26.11.pdf</a></li> </ul>
Civil Rights	14.12	Gender-Inclusive Schools	<p>A. Submit an action plan for promptly updating the LEA’s gender-inclusive schools’ procedure (WSSDA’s 3211P or equivalent). Include dates in action plan and identify who will be responsible for overseeing changes and board adoption, where required. Upload copy of proposed procedure for review before taking to board. Upload DRAFT procedure.</p> <p>C. Submit evidence that the Gender-Inclusive Schools Coordinator has attended (in person or online) an OSPI training on harassment, intimidation, and bullying, and gender-inclusive schools. Evidence should include training materials, certificates of attendance, or agendas. (If training has not yet been attained, please submit action plan to obtain required training. Call the School Safety Center at OSPI to inquire about available training opportunities: 360-688-3375.)</p>



			D. Describe how the LEA will begin sharing its gender-inclusive schools' policy with students, parents, volunteers, and employees once adopted (e.g., published in student and employee handbooks).
Title III/TBIP	7.3	Title III-Eligible Native American Students	<p>Parent notification letters were not provided for the requested students. Develop an action plan which outlines the process by which the district will ensure that parents are notified of potential eligibility for Title III services, initial placement, and continued eligibility.</p> <p>In addition to the action plan, provide evidence of services provided for students who qualify under Title III.</p>
Title III/TBIP	7.9	Program Evaluation	Please submit an action plan which outlines the process for evaluating the effectiveness of the programs and activities conducted using TBIP and Title III funds for each of the elements 7.9 A - H. Please include specific action steps, targeted completion dates, and persons responsible. Specifically address how the district will use the evaluation of the program to make specific, actionable improvements. The action plan template is available on the OSPI website for CPR.

If you have any questions or concerns about the information provided in this report or if you need further technical assistance, please contact us individually or via the team lead of this review. The agency TTY number is (360) 664-3631.

cc:

Andy Wheeler, CPR Contact, La Conner School District

Brian Gianello, Fiscal Contact, La Conner School District

Jason Miller, CPR Team Lead, Office of Superintendent of Public Instruction

**Needs Work**

**From:** jason.miller@k12.wa.us

**To:** wnelson@lc.k12.wa.us

**CC:** awheeler@lc.k12.wa.us; bgianello@lc.k12.wa.us; deifi.stolz@k12.wa.us

**Subject:** 2021-2022 La Conner School District Review (CPR) Final Report

**Attachments:** No attachments found for this message.

Old Capitol Building  
PO Box 47200  
Olympia, WA 98504-7200  
  
k12.wa.us



Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

7/26/2022

TO: Will Nelson, Superintendent  
La Conner School District

FROM: Jason Miller, Team Lead

RE: 2021-2022 Review Final report

On June 14, 2022, our office sent an email indicating that all 2021-22 will close on July 15. This is a follow up to that communication.

On July 15, a team from the Office of Superintendent of Public Instruction (OSPI) completed a review of federal and state programs in which your Local Education Agency (LEA) participates.

The report below includes the remaining noncompliant items. As noted in the June 14, 2022, communique, the noncompliant items listed below will be considered as part of an annual risk assessment for identifying which LEAs to review in the 2022-23 review cycle.

This email serves as the final 2021-22 CPR report. The official review closure notification will be emailed to you soon.

**Noncompliant Item(s)**

Program	Number	Description	Actions Required
Perkins-CTE	12.2	State CTE Approval/Frameworks	<p>A. Please provide program approval evidence for Skilled and Technical Sciences and STEM.</p> <p>School District has indicated the need to submit new applications for Digital Photography and Robotics as the program approval process was not completed in 2018.</p> <p>La Conner is in Group 2 for the Program Approval Process. This indicates the following timeline:</p> <p>2020 -- Skilled and Technical Sciences (STS) Program Approval was not done.</p> <p>2021 -- STEM Program approval was not done.</p> <p>What is required now? In order to be offering courses in these areas, course submissions are now required. These will then be reviewed, comments provided for additional work as necessary, review, and then approval.</p> <p>Contacts:</p> <p>STS Program Supervisor is Roger Rich, roger.rich@k12.wa.us</p> <p>STEM Program Supervisor is Jill Diehl, jill.diehl@k12.wa.us</p>
Perkins-CTE	12.5	Professional Development/CTE Personnel	<p>As the LEA moves forward in working with the new CTE director, C. and D. can be addressed. At this point, they are noncompliant.</p> <p>C. Please provide evidence the instructors teaching STEM and STS hold current CTE certificates to teach the classes.</p> <p>Vince Cicotte's CTE Conditional Teacher application status indicates OPEN and has not been issued. The application submitted by the district request was submitted on 10/13/2021.</p>

			<p>The eCert system indicates Mr. Cicotte has a Continuing Teacher certification, Issued 12/16/2019, Expires 6/30/2026.</p> <p>There needs to be follow up in order for the CTE classes being taught by Mr. Cicotte to receive enhanced funding.</p> <p>D. If you have any conditionally certified instructors, please provide proof of written training plans.</p> <p>District provided a narrative about the training all CTE staff will be receiving.</p> <p>Each individual teacher who is on a CTE Conditional Certification needs to have a written training plan that is signed and dated by the teacher and CTE director.</p>
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cc:

Andy Wheeler, CPR Contact, La Conner School District

Brian Gianello, Fiscal Contact, La Conner School District

**Final Approval Completed**

**From:** cpr@k12.wa.us

**To:** wnelson@lc.k12.wa.us

**CC:** awheeler@lc.k12.wa.us; bgianello@lc.k12.wa.us; jason.miller@k12.wa.us;  
Deifi.stolz@k12.wa.us

**Subject:** Final Closure of La Conner School District for Consolidated Program Review (CPR) 2021-22

**Attachments**  
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PO Box 47200  
Olympia, WA 98504-7200

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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

7/26/2022

TO: Will Nelson, Superintendent  
La Conner School District

FROM: Jason Miller, Executive Director

Elementary Education, Early Learning, Special Programs & Federal Accountability

RE: Final Closure of Consolidated Program Review (CPR) 2021-22

This letter serves as official notice that your LEA's Consolidated Program Review (CPR) that took place on 3/10/2022-3/10/2022 is closed. There are no further items to be addressed in Program Monitor. Please continue the work implementing any approved action plans and identified noncompliant items.

Note that a previous email was sent with additional information about evidence needed, or noncompliant items.

If you have any questions or concerns about the information provided in this report or if you need further assistance, please contact Jason Miller, Executive Director for Elementary Education, Early Learning, Special Programs & Federal Accountability at [jason.miller@k12.wa.us](mailto:jason.miller@k12.wa.us) or 360-764-6079. The agency TTY number is (360) 664-3631.

Thank you.

--

cc:

Andy Wheeler, CPR Contact, La Conner School District

Brian Gianello, Fiscal Contact, La Conner School District

Jason Miller, CPR Team Lead, Office of Superintendent of Public Instruction

# 2020-2022 Biennial Report for Washington State Post-Secondary Institutions

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## Introductory Materials & Staff Resources

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On February 6, 2020, the U.S. Department of Education’s Office of Civil Rights (OCR) and Office of Career, Technical, and Adult Education (OCTAE) jointly issued an updated Memorandum of Procedures (MOP) requesting each state submit a plan for administering Methods of Administration (MOA) and ensuring the civil rights of all students enrolled in educational institutions receiving federal funds from Department of Education (DOE). In response to this request, Washington State’s Workforce Training and Education Coordinating Board (WTECB) submitted a revised plan for Washington state (“state”) in June 2020. This plan was approved by OCR on September 18, 2020.

This report provides a report of postsecondary activities conducted under MOA guidelines between July 1, 2020, and June 30, 2022. The report has been prepared following the approved format described in the “Washington: Methods of Administration” report (the “plan”) approved in September 2020. Post-Secondary MOA activities described in this report were conducted by:

State Board for Community and Technical Colleges (SBCTC)  
1300 Quince Street SE  
P.O. Box 42495  
Olympia, WA 98504-2495

### **Staff Resources**

The following individuals employed by SBCTC had responsibility for MOA activities associated with Washington state post-secondary educational institutions:

#### *Washington State Fiscal Year 2020-21*

Staff (Reviews/Technical Assistance)	FTE
Maryam Jacobs, MOA Coordinator	5%
Steve Lewandowski, Principal Architect	1%
Other	0%

#### *Washington State Fiscal Year 2021-22*

Staff (Reviews/Technical Assistance)	FTE
Maryam Jacobs	10%
Steve Lewandowski	5%
Other	0%

For review of post-secondary institutions, SBCTC primarily enlists the skills of two employees: Maryam Jacobs, SBCTC’s System Internal Auditor and the primary post-



secondary MOA Coordinator, and Steve Lewandowski, SBCTC's Principal Architect. Maryam Jacobs, performs all MOA review, technical assistance and communications not related to facilities conditions, as well as reporting functions. Steve Lewandowski performs all tasks relating to facility conditions including reviews, technical assistance and follow-up. Both Steve and Maryam provide technical assistance as needed. In addition, the assistance of an administrative assistant is enlisted for review, editing and preparation of final documents.

## **Section II**

### **Section IIA Compliance**

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During the period under review, new state and agency (SBCTC) policies and procedures related to Section II.A were reviewed and none were found to be discriminatory.

## **Section III**

### **Summary of Monitoring Activity for the Prior Two Years**

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During the prior two fiscal years, no post-secondary reviews were performed. As noted on the approved Washington State MOA Plan, the state post-secondary MOA staff had planned on extensive training during this period to ensure colleges were familiar with all federal civil rights requirements, the process for civil right reviews, and each institutions' responsibility.

## **Section IV**

### **Written Findings and Compliance Plans**

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Not applicable. See section III.

## **Section V**

### **Summary of Technical Assistance Provided**

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As noted on the approved Washington State MOA Plan, the post-secondary MOA staff had planned on extensive training during this period to ensure colleges were familiar with all federal civil rights requirements, the process for civil right reviews, and each institutions' responsibility. Unfortunately, these plans could not be carried out due to restrictions placed by Washington State's governor on all state institutions and the need to abide by local health and safety guidelines. Due to these circumstances, technical assistance provided during the last two years was limited to reaching out to new staff and key individuals to offer resources, answering questions for faculty, staff, and students, and small trainings to select groups as

requested. In addition, the usual follow-up to prior MOA reports was performed and MOA staff worked with colleges to ensure review findings were corrected as previously agreed upon.

## Section VI Additional Information

### **a. Monitoring Updates**

The following table provides a listing of review items related to previous bi-annual reports that remain unresolved as of the date of this report’s submission. The table also includes reason(s) for any delays and the date the item is expected to be corrected:

Institution	Year of Original Review	Section	Item(s) Remaining Open	Date of Expected Correction	Reason for Delay (If applicable)
Wenatchee Valley College – Main Campus	2018	Facility Accessibility	ADA0446 ADA0461 ADA0450 ADA0462 ADA0452 ADA0463 ADA0453 ADA0465 ADA0455 ADA0466 ADA0456 ADA0468 ADA0457 ADA0469 ADA0458 ADA0477	June 2023	Operations suspended due to COVID
Wenatchee Valley College-North Campus	2018	Facility Accessibility	ADA0479 ADA0482 ADA0486	June 2023	Operations suspended due to COVID
Spokane Falls Community College – Main Campus	2019	Facility Accessibility	ADA0533	April 2023	Operations suspended due to COVID
Spokane Falls Community College – Magnuson Site	2019	Facility Accessibility	ADA0544 ADA0549 ADA0545 ADA0550 ADA0546 ADA0551 ADA0547 ADA0552 ADA0548 ADA0553	April 2023	Operations suspended due to COVID
Grays Harbor College – Main Campus	2020	Facility Accessibility	ADA0002 ADA0025 ADA0003 ADA0026 ADA0004 ADA0027 ADA0005 ADA0028 ADA0006 ADA0029 ADA0007 ADA0030 ADA0008 ADA0031 ADA0009 ADA0032 ADA0010 ADA0033	September 2023	Operations suspended due to COVID

			ADA0011 ADA0034 ADA0012 ADA0035 ADA0013 ADA0036 ADA0014 ADA0037 ADA0015 ADA0038 ADA0016 ADA0039 ADA0017 ADA0040 ADA0018 ADA0041 ADA0019 ADA0042 ADA0020 ADA0043 ADA0021 ADA0044 ADA0022 ADA0045 ADA0023 ADA0046 ADA0024		
<i>Grays Harbor College – Riverview Education Center</i>	<i>2020</i>	<i>Facility Accessibility</i>		<i>September 2023</i>	<i>Operations suspended due to COVID</i>

**b. Sub-Recipient Universe**

The community and technical college system is comprised of 34 individual college campuses with an additional 54 satellite campuses. The system uses 987 owned buildings and 99 leased buildings with over 21 million square feet.

The system sub-recipient universe consists of five technical colleges and 28 community colleges which make up the universe of 33 sub-recipients. Two individual colleges in the Pierce district are combined as one subrecipient. A list of Washington State post-secondary institutions in the community and technical college system, as well as the date of their last complete MOA review are follows:

**Washington State Community and Technical Colleges**

	<b>Name of Institution</b>	<b>Type</b>	<b>Date of Last MOA Review</b>
1	Bates Technical College	Technical	October 2015
2	Bellevue College	Community	September 2016
3	Bellingham Technical College	Technical	February 2012
4	Big Bend Community College	Community	April 2019
5	Cascadia College	Community	November 2011
6	Centralia College	Community	June 2012

	Name of Institution	Type	Date of Last MOA Review
7	Clark College	Community	July 2006
8	Clover Park Technical College	Technical	November 2009
9	Columbia Basin College	Community	October 2017
10	Edmonds Community College	Community	March 2003
11	Everett College	Community	April 2006
12	Grays Harbor College	Community	March 2020
13	Green River College	Community	February 2008
14	Highline College	Community	October 2007
15	Lake Washington Institute of Technology	Technical	November 2012
16	Lower Columbia College	Community	October 2009
17	North Seattle College	Community	October 2014
18	Olympic College	Community	September 2014
19	Peninsula College	Community	December 2008
20	Pierce College	Community	October 2015
21	Renton Technical College	Technical	October 2016
22	Seattle Central College	Community	November 2007
23	Shoreline Community College	Community	November 2008
24	Skagit Valley College	Community	October 2008
25	South Puget Sound Community College	Community	February 2012
26	South Seattle College	Community	October 2010
27	Spokane Community College	Community	June 2006
28	Spokane Falls Community College	Community	October 2019
29	Tacoma Community College	Community	August 2017
30	Walla Walla Community College	Community	May 2006
31	Wenatchee Valley College	Community	October 2018
32	Whatcom Community College	Community	November 2007
33	Yakima Valley College	Community	July 2013