

DPI Pupil Nondiscrimination Self-Evaluation Report: Fall 2024

***Complete Self Evaluation Report and Related Requirements
DATE: 9.10.24**

Whitnall School District

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Section I - General Overview of PI-9 Pupil Nondiscrimination

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

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

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

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

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

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

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

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

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

Wisconsin State Statute 118.13 and Administrative Rule PI 9.06

Wisconsin State Statute 118.13	Administrative Rule PI 9.06
<p>118.13 Pupil discrimination prohibited. (1) No person may be denied admission to any public school or be denied participation in, be denied the benefits of or be discriminated against in any curricular, extracurricular, pupil services, recreational or other program or activity because of the person's:</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <ul style="list-style-type: none"> -Sex -Ancestry -Sexual orientation -Race -Religion -National Origin -Creed -Pregnancy, marital or parental status -Physical, mental, emotional or learning disability </div>	<p>PI 9.06 Evaluation. (1) In order to provide the information necessary for the state superintendent to report on the compliance with s. 118.13, Stats., as required under s. 118.13 (3) (a)3., Stats., each board shall evaluate the status of nondiscrimination and equality of educational opportunity in the school district at least once every 5 years on a schedule established by the state superintendent. The evaluation shall include the following:</p> <ul style="list-style-type: none"> a) School board policies and administrative procedures. b) Enrollment trends in classes and programs. c) Methods, practices, curriculum and materials used in instruction, counseling, and pupil assessment and testing. d) Trends and patterns of disciplinary actions, including suspensions, expulsions and handling of pupil harassment. e) Participation trends and patterns and school district support of athletic, extracurricular and recreational activities. f) Trends and patterns in awarding scholarships and other forms of recognition and achievement provided or administered by the school district. g) School district efforts to achieve quality of education opportunity and nondiscrimination. <p>(2) The board shall provide an opportunity for participation in the evaluation by pupils, teachers, administrators, parents and residents of the school district.</p> <p>(3) The board shall prepare a written report of the evaluation which shall be available for examination by residents of the school district.</p>

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

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

Name	Position
Jackie Winter	Director, Pupil Services
Dana Ryan	Director, Advancement & Analytics
Regina Brown	Counselor
Janet Callender	Counselor
Josie Carballido	Counseling Intern
Cindy Collins	Assistant Principal
Megan Harris	Activities and Athletics Director
Lucas Jensen	Instructional Coach
Mark Matenaer	Dean of Students
Charles Tollefsen	Principal
Grant Van Grinsven	Counselor
Kayla Wigg	Social Worker
Kelly Witz	School Psychologist and Parent
Kathryn Zimpel	Instructional Coach

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

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

- ☒ Individual meetings
- ☒ Department meetings
- ☒ Discussion item at an administrative meeting

Section III District Overview - Whitnall School District

The Whitnall School District serves approximately 2,400 students between the ages of 3-21, across four school buildings and one charter school. The District is located in Greenfield, Wisconsin, and serves the communities of Hales Corners, part of Greenfield, and part of Franklin.

Our Purpose

The Whitnall School District engages learners in safe, academically challenging, and supportive experiences so that all students can reach their personal learning goals.

Our Vision

Every Whitnall graduate is prepared to realize their full potential and to positively impact local and global communities.

Our Passion

The Whitnall School District embraces the unique story of every child.

[Link to our Strategic Plan](#)

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

[District Enrollment Data Set](#)

Section IV - School Board Policies and Administrative Procedures

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

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

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

Summary Report Data

Findings:

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

Method of Analysis:

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

Supporting Information:

The following information was reviewed:

[Link to District Policy Page](#)

- PO 2260 Nondiscrimination and Access to Equal Educational Opportunity
- PO 2260.01 Section 504/ADA Prohibition Against Discrimination Based on Disability
- PO 2266 Nondiscrimination on the Basis of Sex
- PO 5517 Student Anti Harassment

- PO 5730 Equal Access for Non-District Sponsored Clubs/Activities
- AG 2260 Nondiscrimination and Access to Equal Educational Opportunity
- AG 2260D Notice of Nondiscrimination
- AG 2266 Nondiscrimination on the Basis of Sex
- School Student Handbooks
- Title IX procedures and investigative process materials

Recommendations for Improvement and Implementation Strategies:

- The District's designated compliance officer is Jackie Winter, Director of Pupil Services and Jason Bahl, Human Resource Manager. With recent shifts to Title IX policy and procedures, updated training has been required by all District employees.
- It is recommended that the District require training on an annual basis and implement table top training exercises for building administrators.

Section V – Enrollment trends in classes and programs

The purpose of this section is to ask the district to examine enrollment trends and patterns within classes and programs provided by the district.

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

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

Summary Report Data

Findings:

- Number of students enrolled in AP classes is increasing
- Number of students scoring 3+ on AP tests is increasing
- Lower male participation in AP classes
- Increase in Hispanic/Latino students in AP classes from 2021 to 2023
- Students classified as economically disadvantaged are not proportionately represented in AP classes and are less likely to take AP exams than non-economically disadvantaged peers
- Economically disadvantaged students were overrepresented in CTE classes in 2022-23 (26%), but were underrepresented in previous years
- Percentage of students with disabilities who were CTE completers is nearly directly proportionate to the overall percentage of students with disabilities in the school population
- Gender and race in CTE classes is not representative of population
- CTE classes have a slightly lower proportion of Hispanic students and a slightly higher proportion of White students than found in the general population
- In 2022-23, female students made up 28% of CTE concentrators, the highest percentage in three years; however, male students are still overrepresented in CTE pathways
- Female students were overrepresented in specific CTE pathways (Accounting, Nursing, and Marketing), which accounted for the majority of female students who were CTE concentrators

Method of Analysis:

- Meeting and discussion with the high school counseling and administrative teams
- Systematic review of data in comparison with district and building demographic information

Supporting Information:

The following information was reviewed:

- AP and CTE course enrollment data from 2020-21 to 2022-23

Recommendations for Improvement and Implementation Strategies:

- Reevaluate high school course offerings and how courses are advertised to students to ensure that all students have equal access to course registration
- Begin targeted advertisement to fee reduced families regarding AP fee waivers
- Discuss how CTE concentrator pathways are indicated to ensure accurate data collection for students in specific pathways

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

The purpose of this section is to ask the district to examine the method, practices, curriculum and materials used in PK-12 school counseling to determine whether all students are being included in the learning process.

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

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

Summary Report Data

Findings:

- In 2018, the District adopted Lions Quest curriculum to support Tier 1 SEL instruction. The program is supplemented by lessons designed to address behavior and social concerns identified by school based behavior teams reviewing and analyzing data.
- In fall 2022, the District implemented a student engagement survey. The survey questions were divided into three categories: advancement, belonging and courage. After the first administration of the survey, “Students at this school solve problems with other students by talking to them.” was our second lowest rated question.
- In January 2023, the District provided professional development to all staff on Effectively Supporting Student Relationships. The elementary training included an introduction to problem solving procedures that would be utilized across both buildings. The secondary training included restorative practice procedures.
- In fall 2023, the Pupil Services team initiated work to document Tier 2 and Tier 3 SEL curricular options. During the process it was determined that Tier 1 SEL was not consistently being delivered at the elementary level. This was due to a building schedule change to accommodate new ELA curriculum requirements.
- Since the 2019-20 school year, the District has offered SFAP (Student Family Assistance Program) as an alternative to exclusionary disciplinary action and a resource for families seeking counseling.
- The district provides culturally and linguistically accessible support services to students and families by providing interpreters as needed.

Method of Analysis:

- Participation and discussion with school counselors
- Review of Student Engagement Survey results
- Review of professional learning materials
- Participation and discussion with building level principals and district level administration
- Review of SFAP contract

Recommendations for Improvement and Implementation Strategies:

- Ensure that Tier 1 SEL instruction is implemented with fidelity
- Expand curricular resources for Tier 2 and 3 SEL interventions
- Develop clear structure for SEL interventions
- Continue to monitor student engagement survey results and identify district and building action steps connected to the results.
- Provide translated versions in the parent's native language as much as feasible.

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

The purpose of this section is to evaluate trends and patterns in disciplinary actions, policies, and procedures.

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

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

Summary Report Data

Findings:

- Students with disabilities receive out of school suspensions at the elementary and middle level at a higher rate than nondisabled peers
- Students with disabilities receive out of school suspensions at the high school level at a lower rate than nondisabled peers
- At all levels, out of school and in school suspensions for females has risen over the last three years of data collection regardless of race.
- Out of school suspensions have tripled in number between 2020 and 2023
- High school females are suspended at a higher rate than males
- Black males are more likely to have out of school suspension than white males
- During the 22-23 school year, black females represented 65% out of school suspensions

Method of Analysis:

- Review of suspension rates over multiple years
- Review of policies
- Review of Student Handbooks
- Review of discipline data by race, disability, gender

Recommendations for Improvement and Implementation Strategies:

- Identify actions steps by level in order to address variables in data
- Provide cultural sensitivity training for staff in order to address bias in behavior
- Continue to build systems of positive behavior supports
- Cross analyze behavior data and student engagement survey results

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

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

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

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

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

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

Summary Report Data

Findings:

- Participation in athletics, broken down by race: 3.4% Asian, 2.9% Black, 13.7% Hispanic/Latino, 8.5% Two or more races, 71.1% White. This is generally representative of our overall middle and high school student population demographics.
- 6.3% of students with disabilities participate in athletics and activities
- Gender distribution for activities: Gaming 67% male, Drama 87% female, DECA 62% female, Forensics 73% female, International Club 78% female, LEO 89% female, Mock Trial 88% female, NHS 71% female, Peer Mentors 70% female, Red Cross 78% female, Red Gen 87% female, Robotics 75% male
- Unequal gender distribution in cross country, swim, and tennis
- Students with disabilities participate at a higher rate in gaming, robotics and Red Cross. 15% involvement

Methods of Analysis

- Data Analysis of participation rates, disaggregated by gender, ethnicity, race, disability status, English language learner status, and economically disadvantaged status.

Supporting Information

The following information was reviewed:

- Whitnall High School athletic and activity offerings
- Whitnall Middle School athletic and activity offerings

Recommendations for Improvement and Implementation Strategies

- Determine barriers for Black students participating in athletics
- Educate advisors in inclusionary practices
- Identify additional sources of data to determine if students are engaged in non school sponsored athletics or activities. Focus groups should be considered
- Research [BSU](#) to determine effectiveness and appropriateness for WSD

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

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

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

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

Summary Report Data

Findings:

- Scholarship capture is not accurate. Students self report and scholarships are often based on financial need.
- Data is not collected on Pell Grants and other financial aid packages that include grants
- Scholarship data is representative of the population that elects to go to college
- The scholarship committee has worked hard to implement a new selection process that reduces the potential for individual biases or discrimination. The process assigns each application a number and conceals the identity of the applicant until after ratings are completed.

Methods of Analysis

- Participation and discussion with school counselors and administration
- Analysis of gender, race, ELL and disability status of the recipients for the last three years
- Scholarship data

Recommendations for Improvement and Implementation Strategies

- Improve the data collection process for scholarships
- Ensure that new courses are considered under the CTE concentrator: Health Care Pathway
- Targeted advertisement regarding financial assistance with AP fees
- The scholarship data (applicants and recipients) will be desegregated and shared annually with the scholarship committee and high school administration. The data will include scholarship recipient and applicant rates by gender, race, ELL, and disability status.
- Discuss and determine how concentrator pathways are indicated in IC

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

The purpose of this section is to evaluate the district's efforts to achieve equality of education opportunity and nondiscrimination. Focusing on the district's efforts and progress in closing academic achievement gaps and creating a school environment that does not discriminate based upon the protected categories listed in Wis. Stat. 118.13.

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

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

Summary Report Data

Findings:

- Black and Hispanic/Latino students fall in the Basic and Below Basic category on the WI Forward at a higher rate than other racial/ethnic groups
- Male students achieve proficiency in math on WI Forward at a higher rate than females
- Female students achieve proficiency in ELA on WI Forward at a higher rate than males
- Students without disabilities achieve proficiency in all content areas on the WI Forward at significantly higher rate than students with disabilities
- Students who are not economically disadvantaged achieve proficiency in all content areas on WI Forward at significantly higher rates than students who are economically disadvantaged
- In 2022-23, male students had a slightly higher average ACT composite than female students, which was different than two prior years
- In 2022-23, far fewer male students in Grade 10 achieved Ready or Above status in all areas on the ACT than females
- Regarding average composite scores on ACT, the gap is widening between students who are economically disadvantaged and those who are not; average ACT composite scores for economically disadvantaged students have remained steady over three years, while the average ACT composite scores for non-economically disadvantaged students are increasing; the rate of widening is consistent across years
- Regarding average composite scores on ACT, the gap is widening between students with disabilities and students without disabilities, as average ACT composite scores for students with disabilities have remained steady with a decline in 2023-24, while average ACT composite scores for students without disabilities are growing; the rate of widening is increasing

Method of Analysis:

- Review and analysis of WI Forward, PreACT, and ACT data
- Meeting and discussion with building administrators, counselors, and instructional coaches

Recommendations for Improvement and Implementation Strategies:

- Provide cultural sensitivity training for staff in order to address bias
- Establish a process for yearly review of course data; including process for sharing with staff
- Course recommendations - ensure that all students know what all courses are for equitable advertising
- Continuing the use of classroom data to make instructional decisions for students (what are they collecting, how are they using it)

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

The purpose of this section is to evaluate the availability of Pupil Nondiscrimination policies and materials for students, parents, and staff.

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

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

Summary Report Data

Findings:

- All school district policies are available electronically or in hard copy (as requested) by the general public
- Previous Pupil Nondiscrimination Self Evaluation Report was not available to public
- Opportunities for participation in the self-evaluation process were provided for students, teachers, parents, and community members

Method of Analysis:

- Review of Whitnall webpage

Recommendations for Improvement and Implementation Strategies:

- Identify appropriate place on Whitnall webpage for posting Pupil Nondiscrimination Self Evaluation Report
- Post Pupil Nondiscrimination Self Evaluation Report