

DPI

Pupil Nondiscrimination

Self-Evaluation Report:

May 2024

***Complete Self Evaluation Report and Related Requirements**
DATE: May 30, 2024

School District of Tomahawk

Written report shared to the
School Board on June, 11 2024

PI 9 District Designee:
Wendy Simonis
Director of Pupil Services/Special Education
(715) 453-2126 ext. 405
simonisw@myhatchets.org

DPI Contact: Paul Sherman, Pupil Nondiscrimination Program Consultant
Phone: 608-267-9157 Email: paul.sherman@dpi.wi.gov

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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: 5px;"> <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
Wendy Simonis	Director of Pupil Services/Special Education
Mark Schommer	Director of Teaching and Learning
Ryan Huseby	High School Principal
Stacy Bolder	Middled School Principal
Sheri Woodall	High School Asst. Principal
Wendell Quesinberry	District Administrator
Dan Reiter	School Counselor
Jen Beaumier	Counseling Admin. Assistant
Guy Steckbauer	Elementary Principal
Ryan Flynn	Activities Director
Cassie Cerny	School Counselor
Denise Peissig	School Counselor

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:

- Open meeting portion of a scheduled school board meeting
- Individual meetings
- Department meetings
- Discussion item at an administrative meeting

Section III District Overview – School District of Tomahawk

The School District of Tomahawk serves over 1,241 students between the ages of 3-21, in a connected complex including the elementary, middle and high school buildings. The School District of Tomahawk is located in north-central Wisconsin, approximately 40 miles north of Wausau. The district serves the city of Tomahawk and the surrounding townships with an approximate population of 11,800 residents. Tomahawk is a friendly small town surrounded by more than fifteen lakes and flowages with thousands of acres of publicly accessible forests, offering many recreational opportunities.

Our Mission

The School District of Tomahawk will become the school district of choice known for its high levels of student achievement, the excellence of its programs, and its sound stewardship.

Our Vision

Empowering all students to be socially responsible, life-long learners in an ever-changing world.

Our Pillars

The pillars of Teaching, Learning, & Relevance, The Whole Student, Communication & Community Engagement, District Workforce, and Operational reflect the values which uphold our Mission and Vision. This assists us to prioritize the Objectives and Goals in our Strategic plan.

[Link to 2023-2024 District Balanced Scorecard](#)

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 WISE Dash Database. The school district submits data annually to this state-wide system. The district recommends caution in the review of data, especially from the 2019-20 and the 2020-21 school years. This data has been included, but will limit some of the ability to examine multi-year trends or patterns. This was primarily due to the significant impact of the pandemic on the data of the school during those years. 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. It is also important to note that all data present in the WISE Dash system for the 2023-24 school year has not been validated or updated, and should be disregarded from the graphs and charts provided below.

[Link to District 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 and student handbooks.

Method of Analysis:

- Review and Examination of policies 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
- School Student Handbooks
- Title IX procedures and investigative process materials

Recommendations for Improvement and Implementation Strategies:

- The District's designated compliance officers are Wendy Simonis, Director of Pupil Services and Special Education, Guy Steckbauer, Elementary Principal, and Ryan Huseby, High School Principal. All compliance officer information needs to be updated regularly as part position shifts.
- The District shall continue to publish an annual class 1 legal notice and include the nondiscrimination statement in all student handbooks as required in Policy 2260D.
- Review Administrative Guidelines
- It is recommended that the district place the nondiscrimination statement in a prominent location within the school website or policy entry page.

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

[Link to District Data Set](#)

Method of Analysis:

- Department meeting and discussion with the entire district counseling team.
- Academic Career Planning, Advanced Placement, Dual Credit, Perkins data from WISEdash
- Building Leadership Team di

Supporting Information:

The following information was reviewed:

- Enrollment Trends
- [THS Vital Signs Scorecard Summary](#)
- Student demographics

Recommendations for Improvement and Implementation Strategies:

- Continued monitoring of student trends and data through ACP process, WISEdash
- Continued monitoring and measurement using the Strategic Planning Scorecard

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 Wisconsin adopted the American School Counselor Association (ASCA) model. The ASCA National Model guides school counselors in the development of school counseling programs that:
 - are based on data-informed decision making
 - are delivered to all students systematically
 - include a developmentally appropriate curriculum focused on the mindsets and behaviors all students need for postsecondary readiness and success
 - close achievement and opportunity gaps (see how equity is woven into the ASCA National Model)
 - result in improved student achievement, attendance and discipline
- In 2023, the district established an SEL curriculum review committee to review and recommend an SEL curriculum as the current license with “Second Step” was ending.
 - The committee was comprised of school board members, administrators, counselors, teachers, parents, and community members.
 - The committee developed a vision and rubric for the selection process.
 - Ultimately, the new options were rejected and the curriculum remains “Second Step”
 - 2024-2025 there will be a additional access to high school level “Second Step” curriculum
 - Second Step has the highest rating in the Every Student Succeeds Act Evidence-Based Improvement Strategies for Social Emotional Learning.
- The school counseling curriculum is delivered to students through a combination of individual learning plan meetings, lessons/presentations, evening programs, and one on one student sessions.
- Counselors are actively involved in the Lincoln County Healthy Minds Coalition, grant opportunities through Aspirus Health and Marshfield
- Creation of a Raise Your Voice Club for students, Aggression Reduction Therapy, Life Tools Grant, Love and Logic trainings for families and staff, and Mental Health First Aid Training
- Individual learning plan meetings are held for all students in the 5th-12th grade. This is an important component of meeting each student's unique needs and working with each student to create a plan for success.

- o Various district and school forms have been provided in English and in Spanish, including those used for registration.
- o The district provides culturally and linguistically accessible support services to students and families by providing interpreters as needed.

Method of Analysis:

- o Participation and discussion with school counselors
- o Participation and discussion with building level principals and district level administration
- o Review of curriculum decisions and changes related to the counseling program

Supporting Information:

The following information was reviewed:

- o Review of counseling program procedures/processes

Recommendations for Improvement and Implementation Strategies:

- o Continue to increase the data tracking and decision-making related to the multi layered systems of support in each building level
- o Expand the use of small group interventions, thus reducing the need for extensive individual student interventions
- o Addition of a School Counselor at Elementary, completed
- o Propose addition of a School Social Worker
- o An increased emphasis should be placed on career exploration and planning. The district is currently using the Xello web based program extensively grades 6-12. An expansion and increased emphasis on Academic and Career Planning across grades 6-12 is recommended.
- o Review of K-12 Counseling Program Scope and Sequence
- o Review of K-12 Counseling Program Themes and Benchmarks
- o Review of partnerships and resources with Lincoln County, wraparound services, and Lincoln County Healthy Minds Coalition goals
- o Review of counseling practices and procedures (small group offerings, risk assessment procedures, and student support plans)

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:

- Male students are more likely to be suspended than female students.
- Elementary Students are suspended at a higher rate than upper grade levels

Method of Analysis:

- Review of suspension rates over multiple years
- Review of policies:
 - PO 5605 Suspension/Expulsion of Students with Disabilities
 - PO 5610 Suspension and Expulsion
 - PO 5610.02 In-school restriction/In-school suspension
 - PO 5611 Due Process Rights
- Review of Student Handbooks
- Analysis of WISE Dash Discipline Data
- Review of Annual State Pupil Nondiscrimination Reports

Supporting Information:

The following information was reviewed:

- WISEdash Data Review
- Educlimber and Skyward Data
- School District of Tomahawk - WI Pupil Nondiscrimination Annual Report

Recommendations for Improvement and Implementation Strategies:

- Review Exclusionary Practices for students with disability
- Apply for ES3 grant to address Social and Emotional Skill to address needs
- Explore Alternative Education opportunities at grades 1-8

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:

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

Summary Report Data

Findings:

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Methods of Analysis

- Participation and discussion with Activities Director
- Data pull from Infinite Campus student management system
- 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:

- Tomahawk High School athletic offerings
- Participation rates/data from the Activities Department

Recommendations for Improvement and Implementation Strategies

- o Continue to focus on improving the participation rates of racial, ethnic, cultural, and linguistically diverse students in both athletics and activities.
- o Continue to focus on improving the participation rates of students with disabilities in all areas.
- o Continue to measure through [Activities Department Scorecard and Plan of Work](#)
- o Identify any remaining barriers in each area for students facing economic challenges and identify community services/resources to eliminate those barriers.

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 parent/guardians are informed.
- Develop recommendations to ensure that the amount and number of scholarships and other types of awards are equitably distributed.

Special Note - The following legal requirements should be followed for scholarships, awards, gifts and grants: (Please consult the DPI website for details and statute citations.)

School districts may administer sex-restrictive scholarships or financial aid established through wills, trusts, bequests and other legal instruments if the overall effect is not discriminatory. To determine if the overall effect is nondiscriminatory, a school district must first select students on the basis of nondiscriminatory criteria. The school district may then award all scholarships and aid, including sex-restricted scholarships. However, in doing so, none of the selected students can be denied aid or scholarships because some of the awards were originally designated for persons of the other sex. A district may also choose to not administer or assist in administering sex-restricted scholarships.

Athletic scholarships must be available for both males and females in proportion to the number of males and females participating in the interscholastic athletic programs.

Findings:

- The local scholarship program is directly administered by a scholarship committee.
- The scholarship committee implements a selection process that reduces the potential for individual biases or discrimination.
- A scholarship letter and applications are posted online, and available in student services. The application is only in English at this time.
- The high school counseling office keeps an annual list of the scholarships recipients.
- Scholarship descriptions and selection criteria are established/reviewed annually and are managed by scholarship committee and high school student services administrative assistant.
- The school district's nondiscrimination statement is present on local scholarship information.
- Female students have consistently applied at higher rates and received more scholarships than male students

- o Students with disabilities and English Language Learners have been consistently underrepresented as scholarship recipients.

Methods of Analysis

- o Participation and discussion with school counselors
- o Review of policies, award recipients, and all scholarship related materials
- o Participation and discussion with high school principal

Supporting Information

The following information was reviewed:

- o Policy 5451.01 Wisconsin Academic Excellence Scholarship Program
- o Policy 5451.02 Technical Excellence Higher Education Scholarship
- o Local Scholarship Application Form and Letter
- o School Newsletters
- o Data lists of scholarship awards recipients
- o Verbal and anecdotal notes of scholarship process
- o Interview with Scholarship Committee

Recommendations for Improvement and Implementation Strategies

- o The Scholarship Committee focuses on efforts on the selection criteria and reducing the likelihood of discrimination.
- o Information on applying scholarships needs to be more readily available to all students and their families in their native language as much as feasible. This process should begin with translating the application into Spanish and Russian and then expand to other relevant documents.
- o 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.
- o The scholarship committee will review the data annually and recommend changes to the process and procedures to improve student participation rates and scholarship recipients across gender, race, ethnicity, disability status, and English Language Learner Status.

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

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:

- In August of 2019 community members in the School District of Tomahawk gathered together to discuss its priorities for the School District of Tomahawk (SDT). Out of this discussion, a 5-year strategic plan will be developed, taking the district beyond 2025.
- Annually, District leaders, department leadership teams, and building leadership teams will set goals and identify the strategic actions to ensure progress towards the five-year outcomes identified in the strategic plan.
- Goals, measurements, and progress are reported out three times per year at school board meetings.
- The district continues the Balanced Scorecards through the Strategic Plan, which directly addresses the quality of the education for all students and the district’s focus on Nondiscrimination.
- District-wide goals are directly shared in the strategic plan addressing:
 - Adaptive and focused pathways for student growth.
 - Acknowledgment of the balance of student needs for social emotional development.
 - Engaging our parents and community stakeholders through excellence in communication.
 - To attract, retain, and support district staff.
 - Providing quality facilities and budgeting to support student staff, and community success.

Method of Analysis:

- School Board Agendas

- Review/Discussion of Strategic Plan and process
- Review of survey results
-

Supporting Information:

The following information was reviewed:

- [District Strategic Plan](#)

Recommendations for Improvement and Implementation Strategies:

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

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

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.

Method of Analysis:

- Review of Handbooks
- Review of District Website
- Review of Policies and procedures

Supporting Information:

The following information was reviewed:

- Student and Staff Handbooks
- District Website
- Board Policies

Recommendations for Improvement and Implementation Strategies:

- Clear link to report of bullying and harassment for students and families