



## **2023 Five-Year Self-Evaluation of the Status of Nondiscrimination and Equality of Educational Opportunity Overview Meeting**

The self-evaluation process required that the district provide opportunity for participation in the process by students, teachers, administrators, parents/guardians, and residents of the school district. Participants for the committee were sought through social media, newsletters, and Thursday Updates. Over 50 individuals submitted their name to be part of the committee. All individuals were welcomed, but 21 attended regularly. Thirteen residents, 6 staff members, 5 parents/guardians, and fewer than 5 students participated. Some participants indicated more than one descriptor. An additional 26 staff members facilitated, presented, or served as table leaders during the committee meetings.

MPS staff members presented information on the eight topics that were designated by the Wisconsin Department of Public Instruction to be discussed:

### **Wednesday, November 1, 2023**

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

### **Wednesday, November 8, 2023**

- School district technology, including electronic communications by school district staff (bullet 8)
- Trends and patterns of disciplinary actions, including suspensions, expulsions, and handling of pupil harassment
- Enrollment trends in classes and programs

### **Wednesday, November 15, 2023**

- School board policies and administrative procedures
- School district efforts to achieve equality of educational opportunity and nondiscrimination

Data were collected after each meeting to provide an opportunity for committee members to have a voice on the topics presented. Data were not collected during table discussions, so participants had the opportunity to dialogue, clarify the information presented, and have questions answered prior to completing the survey. The committee was told during the session that the survey would be the mode of data collection. The data are reported in the Feedback and Data document. An additional FAQ was developed to answer questions submitted during the process and is attached.

### **Findings from the District Self-Evaluation**

After reviewing input from the community committee, policies and practices, data, and reports from various departments and comparing these against benchmarks suggested by the Department of Public Instruction, the district identified the following findings by topic area:



### **Evaluate Board-Approved Policies and Procedures**

The administrative policies and procedures cover a wide range of school operations, including sponsored programs and activities. These policies and procedures are available on the [district website](#). We were able to determine that the policies include all protected categories listed under Wis. Stat. § 118.13. The protected categories in our policies include Administrative Policy 8.01 Student Nondiscrimination, Complaints and Appeals (1) General Principals and Policy:

(b) It is the policy of the Milwaukee Public Schools that no person may be denied admission to any public school in this district or be denied participation in, or the benefits of, or be discriminated against in, any curricular, extracurricular, student service, recreational, or other program or activity because of that person's sex, race, color, national origin, ancestry, creed, religion, pregnancy, marital or parental status, sexual orientation, or physical, mental, emotional, or learning disability or handicap, as required by section 118.13, Wis. Stats., and Chapter PI 9, Wisconsin Administrative Code.

(d) This policy also prohibits discrimination as defined by Title IX of the Education Amendments of 1972 (sex), Title VI of the Civil Rights Act of 1964 (race, color, and national origin), and section 504 of the Rehabilitation Act of 1973 (disability).

The policies also specifically address harassment in Administrative Policy 8.01 Student Nondiscrimination, Complaints and Appeals (1) General Principals and Policy:

(e) "Student harassment" refers to a range of inappropriate behaviors directed toward students, including, but not limited to, name calling, bullying, physical attacks, and intimidation. Student harassment means behavior towards students based, in whole or in part, on sex; race; religion; national origin; ancestry; creed; pregnancy; marital or parental status; sexual orientation; or physical, mental, emotional, or learning disability or handicap, which substantially interferes with the student's school performance or creates an intimidating, hostile, or offensive school environment. The district regards student harassment as a form of discrimination, and such behavior will be subject to discipline.

Additionally, an employee has been designated to receive Wis. Stat. § 118.13 discrimination complaints.

(a) The superintendent shall designate individuals to be responsible for handling complaints concerning discrimination. The name, title, and contact information of each of these individuals, as well as a description of the specific type of complaint handled by each, shall be published annually in the student handbook as well as in any other location where the district is required to publish its notice of nondiscrimination.

(b) It shall be the responsibility of the designated employees to examine existing policies and develop new policies, where needed, to ensure that the Milwaukee Public Schools does not engage in discrimination prohibited by federal and state law.

Administrative Policy 8.02 Student Anti-Sexual Harassment is also available, and notification is made through multiple venues:



(a) The administration in all schools in the district shall inform all staff and students of the adoption of the student sexual harassment policy and provide an orientation with information regarding the definition of sexual harassment, as well as the complaint procedures to be followed.

(b) The discipline chart of the Parent/Student Handbook on Rights, Responsibilities, and Discipline shall include sexual harassment as one of the examples of conduct that violates expectations in the categorical section “Physical Safety and Mental Well-Being.”

The committee raised concerns that our policies are very visionary, but we have not reached the goals outlined in the policies and procedures. The committee’s concerns included the equitable distribution of student mental health resources throughout the district. Additionally, the sustainability of the programs to meet equitable and nondiscriminatory standards outlined within the policies and procedures was of concern. The district continues to work toward the full implementation of policies and procedures with fidelity.

### **Evaluate Enrollment Trends and Patterns in Classes and Programs**

Data indicate that while the district offers a wide range of courses and programs, the distribution is not equal across the district. Many factors come into play, including the size of the school, availability of staff, and interest by students. For example, a small school may be interested in a specialty course but may not have enough students interested or a staff member able to teach the course. Career and technical education courses are a good example, since the setup could cost up to a million dollars in a single school. The district has incorporated means to expand access to a wide range of courses through methods such as telepresence. Again, while we hope to expand the technology to more schools, the costs prohibit rapid expansion.

Committee members indicated the range of courses and programs in Milwaukee Public Schools as the one thing they were most proud of that we were doing to improve equity and nondiscrimination. Many programs such as Black and Latino male achievement, restorative practices, and gender identity and inclusion, for example, were considered part of the best practices of the district. Other programs mentioned were bilingual and dual language programs and immersion programs. While many of these programs are expanding throughout the district, not all programs are available to all schools. Schools will generally choose a single program that best meets their students’ needs. The programs/pathways that are designed to support climate and culture in the building were identified during the continuous school improvement planning process. Strategic planning alignment worksheets were developed for schools that described the project/pathway, the alignment to the strategic plan, a description of quality implementation, and methods to measure implementation and impact of the programs. These helped schools determine which program would best meet the needs of their school and students. To implement programs successfully, there must be a need, an interest, and an ability to implement them with fidelity.

Progress is made each year toward increased enrollment in courses and programs by underrepresented groups based on race, gender, disability, and national origin. To ensure that this trend continues, the school counseling department will meet at least once per year during the month of September to regularly review and evaluate and ensure that schools do not discriminate based on race, color, national origin, sex, or disability.



- Counseling materials and activities (including student course and/or program selection and career/employment selection) and recruitment efforts
- Course and/or program selection process of all students, including those with disabilities
- Disproportionate course enrollments
- Student awards and scholarships

Counseling staff will review the following data/evidence reports found in our student information system:

- Scholarship Report
- Early College Credit Report
- Data Dashboard
- AP/IB/CTE Course Enrollment Report

After gathering the data, school counseling staff will do the following:

- Disaggregate based on race, color, national origin, sex, and disability
- Compare data with overall school enrollment
- Identify any factors that might influence enrollment
- Develop and implement strategies to increase participation in underrepresented groups

While reviewing course and program data, the district found that all schools were not able to offer the range of courses and programs due to student population, transportation, and/or staffing, to name a few reasons. These issues were raised during the development of the district's strategic plan as well. As a result, within the strategic initiative "Rightsizing the District," two activities were identified:

- A plan will be developed to address census and enrollment patterns, space allocations, equity of programming, and student-teacher ratios to better serve the students and families.
- The school's day will be redefined to ensure sufficient instructional minutes for students, opportunities for professional learning/collaboration with staff, and extracurricular engagement for students.

Other recommendations included AP courses at all schools, equitable access to all courses, more technology-based courses, more career and technical education courses (e.g., home economics, trades, financial literacy), driver's education, and highly qualified staff to teach courses. Many of these are in place in the district; therefore, better communication where these courses are available is needed.

### **Evaluate Methods, Practices, Curriculum, and Materials Used in Instruction, Counseling, and Pupil Assessment and Testing**

During the committee work, presentations showed how the district works to eliminate forms of bias or stereotyping that may be present in instructional materials, instructional practices, student assessment, and counseling strategies. Committee members raised concerns regarding the availability of equitable curricula and what actions are taken to address gaps in the district's chosen curricula by administrators and teachers. While we reviewed the process used to choose high-quality instructional materials, committee members indicated that the district should expand who sits on curriculum committees and/or the number of opportunities for input. While there are opportunities within the [Administrative Policy](#) and [Procedure](#) 7.26 to meet this request, methods of communication should be developed so that community members are more aware of these opportunities.



Most assessments used in the district are chosen by the state. There were some members of the committee who believed that assessments should be optional. The greater concern was about how assessments are presented to children to lower test-taking anxiety. While the district trains staff on proper administration, the committee made clear that there were practices that continue that put undue stress on children. As a result, during the spring testing season, the data and assessment team will ensure that more specific guidance is part of the required teacher training for test administration in spring 2024.

Counselors emphasize that courses, programs, roles, and careers are open to all regardless of gender, race, national origin, or disability. The MPS school counseling department ensures that counseling materials, activities, and course selection do not discriminate. Course enrollment will be regularly reviewed to evaluate whether there is disproportion in enrollment patterns, including students with disabilities.

In September of each school year, a self-evaluation of data related to pupil nondiscrimination will be conducted. The school counseling manager will provide needed professional development for school counselors and communicate the information about the curriculum to various stakeholders.

- During this annual meeting, enrollment data will be reviewed with school counselors, programmers, special education supervisors, and transition coordinators.
- Schools will use AP/IB/CTE Course Enrollment Report and the MPS Data Dashboard for data collection to evaluate school and district-level data.
- Each school's counselor will bring their counseling materials. Counselors, programmers, transition coordinators, and special education supervisors will break into groups and identify any concerns related to unintentional discrimination, which may take the form of students of one demographic represented, such as students with disabilities noticeably absent from extracurricular, career and technical education, or academic and career plan programming materials. Counseling materials will also be displayed via screen for discussion by counselors as to any concerns related to inclusion of the protected groups listed, including those with disabilities.

If schools find disproportionality during this review, they will do the following:

- Create a subcommittee that includes a school administrator, school counselor, special education teacher, regular classroom teacher, and programmer.
- Review, revise, and apply course selection criteria.
- Develop multiple criteria for students to be admitted.
- Recruit and retain students for classes with disproportionality.
- Develop support for underrepresented students.
- Students will participate in a pre-assessment and post-assessment survey before and after curriculum implementation in the months of August and May.

### **Evaluate Trends and Patterns in Discipline Actions, Including Suspensions, Expulsions, and Handling of Pupil Harassment**

The self-evaluation asked the district to review disciplinary measures, including suspensions and expulsions, and determine whether they are applied consistently to all students. The committee raised concerns about the disciplinary policies in the district. Committee members suggested prioritizing funding for schools with higher rates of discipline disproportionality and addressing the root causes of discipline incidents within the district through mental health service funding. There was



acknowledgment that work is being done to change the disproportionality, but committee members did not believe that the work was enough and that the disproportionality was too extreme.

The district has policies in place, but the committee members indicated that they were not encouraged about the discipline processes in the district. The recommendations included more teacher professional development, more support for teachers, and holding the teachers accountable for restorative practices, anti-racism, and anti-bias. Suggestions were made that are already part of the district's work, including school options for students with challenging behaviors, no police officers in buildings, safe spaces for students to go if they are removed from the classroom, and more curricula that students connect with and that engages them in learning. The district reports monthly on progress of the efforts to eliminate behavior disproportionality and increase alternate options to suspension.

### **Evaluate Participation Trends and Patterns and School District Support of Athletics, Extracurricular Activities, and Recreational Activities**

A review was done to determine whether students have a variety of athletic and extracurricular activities available, with the necessary resources to make the activities accessible for all students. The committee acknowledged and praised the district's commitment to providing athletic, extracurricular, and recreational activities to students throughout the district. The committee also recommended that students be incentivized to participate in extracurricular and athletic programs to remove potential barriers to participation.

Ideally, students should have a variety of athletic and extracurricular activities available, with the necessary resources to make the activities accessible for all students. The committee felt that there was an adequate range of opportunities for students but expressed concerns about the sustainability of those programs in the long term for students to remain engaged in the activities. Committee members also felt that participation in the activities demonstrated a diverse group of students with varying abilities and demographics. Again, involvement in extracurricular activities was part of the strategic planning surveys in spring 2023. Students were pleased with the offerings available and suggested some additional options. Accessing extracurricular activities has been discussed and, as a result, within the strategic initiative "Rightsizing the District," two activities were identified:

- A plan will be developed to address census and enrollment patterns, space allocations, equity of programming, and student-teacher ratios to better serve the students and families.
- The school's day will be redefined to ensure sufficient instructional minutes for students, opportunities for professional learning/collaboration with staff, and extracurricular engagement for students.

### **Evaluate Trends and Patterns in Awarding Scholarships and Other Forms of Recognition and Achievement Provided or Administered by the School District**

All scholarships and other forms of recognition are awarded in a way that does not discriminate. The committee acknowledged that the district's methods of the awarding of scholarships were equitable but raised concerns about the amount of influence that the district has on how scholarships are awarded to students. The committee voiced concerns about the metrics used to identify the amounts awarded to students relative to the differences between scholarship money and the amount of additional funding for students to attend postsecondary education.





Significant progress has been made toward increasing distribution of scholarships and other awards to underrepresented groups in the district. The committee members acknowledged that the awarding of scholarships was aligned with the demographics of students attending postsecondary education, but they were unclear about what is currently being done to encourage students to pursue postsecondary education or postsecondary work opportunities.

It was clear that participants in the committee were not aware of how scholarships and/or awards are distributed; therefore, the district needs to provide more communication and transparency in the processes. According to Administrative Policy 7.43, Student Awards and Scholarships, “The criteria for determining students eligible for the awards shall be formulated by a committee of teachers and administrators to ensure city-wide uniformity.” This may be an area to review more closely.

### **Evaluate School District Efforts to Achieve Equality of Educational Opportunity and Nondiscrimination**

The Departments of Equity, Access, and Inclusion; Black and Latino Male Achievement; Gender and Identity Inclusion; Restorative Practices; Specialized Services; and Bilingual Multicultural Education all work in concert to support schools with creating action plans that are culturally responsive, ensuring that those students/families impacted by historical achievement challenges have a voice in instructional planning.

These services include intentional programming and course creation, student social academic instructional groups, staff professional development/workshops, and participation on continuous school improvement planning teams to help with data analysis and goal setting. Concerns were raised by committee members about looking more deeply into practices that can be applied across departments. Focusing specifically on creating positive school communities, the district has implemented mandatory professional development that addresses “Courageous Conversations about Race” for all staff. These workshops address areas such as implicit bias, microaggression, and other discriminatory practices that do not support culturally responsive practices.

Additionally, the district reflects on the services provided to students by having them (students) complete a survey (Essentials of School Culture and Climate Survey) that assesses their feelings, beliefs, and experiences within their individual schools. This information is provided to school leaders who then lead discussions with staff members related to the students’ feedback. Schools create school improvement plans related to high expectations in the areas of academic achievement and school climate as a direct response to the student feedback.

An ongoing effort is in place to ensure equality of educational opportunity and nondiscrimination in every Milwaukee Public School and classroom. Concerns were raised by committee members about teacher and staff vacancies occurring in the lowest-performing schools. This concern is being addressed by the Department of Talent Management where there are several efforts in place to incentivize filling vacancies within the district overall. These efforts are also part of the strategic plan in the “Rightsizing the District” initiative. The Department of Talent Management has successfully recruited and placed international teachers to fill vacancies, partnered with historically Black colleges and universities to create an employment pipeline for the purpose of bringing highly qualified certified teachers into the district to work in schools that are predominantly Black student enrolled, and offered staff referral bonuses for current district employees who actively recruit through word of mouth when those hired through the referral process remain for a duration of time. The Department of Talent Management



continues collaborating with colleges and universities to enroll district paraprofessional staff into teacher certification programs as a way to promote an intentional pipeline of employing highly qualified teachers to fill vacancies.

The committee members raised concerns regarding the evaluation process of programs by the district. They sought information regarding the specific impact of each program on students' well-being and academic achievement. Additional resources would be required to engage in districtwide evaluation processes for each academic, extracurricular, recreational, and athletic program.

To ensure that school environments are welcoming to all students and parents/guardians who visit the building, the district has placed parent coordinators at every school to guarantee that there is intentionality in making connections between the school and home. The parent coordinators serve as liaisons of the schools to work with parents on transparency of school calendars, facilitate informational sessions that are centered on parental rights and responsibilities, actively recruit parents to participate on schools' governing bodies such as School Engagement Council and interview teams, and support parents who are a part of the schools' parent-teacher organizations, which are dedicated to supporting teacher appreciation.

Community agencies such as Boys and Girls Club of Greater Milwaukee are placed within schools and offer after-school programming based on student interest that aligns with the schools' visions. The agencies collaborate with parent coordinators to promote "Family Night" events throughout the school year that celebrate the partnerships between the home, school, and community.

The district surveys students and staff to determine a school's readiness to implement changes to benefit the school culture and climate. The results of the survey are used in the school improvement plans that have been created to outline support needed to help schools realize their intended improvements. The district continues to implore schools to showcase culturally responsive practices that celebrate our diversity so that they can be shared on the Milwaukee Public Schools portal.

Equality of educational opportunity and nondiscrimination are considered in the planning and implementation of staff development in the district. Committee members encouraged the district to make restorative practices the districtwide approach to addressing challenging behaviors, with mandatory training on restorative practices and anti-racism. As a result, the Department of Restorative Practices is collaborating with schools to provide foundational training and skill development in creating positive school communities that foster incorporating of stakeholder voice in decision-making, establishing student advocacy/support groups, and repairing/healing harm. This is a newly developed department, but the team is already actively working with community schools in the district. The committee also raised concerns about opportunities not being available at every school in the district. Even though there is a wide range of opportunities within the district, the suggestion was made to limit the number of programs or opportunities and apply them across every school in the district.

#### **School District Technology, Including Electronic Communications by School District Staff**

The committee members felt that the technology services within the district were accessible to all students and families of the district. Likewise, the feedback from the committee indicated that communication strategies were deployed to make certain that information was accessible visually and





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based on language. Concerns were raised regarding the distraction that technology can be for some students.