



At Risk Study Findings and Recommendations 2015-2016

As Fort Atkinson's Director of Pupil Services, bringing the District into compliance with State regulations has been a priority within the department. Bringing forth the results of the first step of our District's At Risk study is another important step in that journey and will help continue our dedication and commitment to "delivering the quality opportunities and services each student needs to achieve his or her academic and personal potential" as our mission indicates.

Project Goals / Purpose

In the fall of 2014, it was discovered that the School District of Fort Atkinson did not have a current At Risk plan filed with the Department of Instruction. It is required by law, that annually, by August 15, each Board of Education will approve a plan for At Risk student programming. In reviewing Board of Education documents, it appears this has not happened for some years. As a result of this finding, the Director of Pupil Services/Special Education added a goal specific to at risk programming to the 2015-2016 Strategic Plan in the Structures and Delivery Models section of the Academic Agenda. This work has taken place throughout the school year and included a review current programming and policies in effect regarding students At Risk. While reviewing these, it was also identified that there was a need for updating of the District's At Risk Program Modifications policy which was originally approved by the BOE in 1997 and was missing current compliance requirements as required by the State of Wisconsin. It was also noted by the Director of Pupil Services that while programs were in place to serve at risk students, it seemed the programs and services were not systemic or sufficient to meet State requirements.

The following are goals typically associated with at risk programming and services:

1. To increase school success and graduation rate for students identified as at risk.
2. To provide opportunities for all students to feel a sense of belonging to the school community.
3. To reduce student failure and potential dropouts.
4. To provide early intervention for students identified as being at risk.
5. To involve parents and community resources in meeting the needs of students identified as at risk.

As the State Statute demonstrates, the need to address concerns regarding students who are at risk of not graduating is a critical one. Researchers have suggested that school dropouts cost the nation from sixty to two hundred twenty eight billion dollars in welfare each year, lost revenue, unemployment expenditures and crime prevention dollars. Further, personal consequences include less earning potential, limited employment opportunities, and low self-esteem.

The following document covers a review of State laws regarding students At Risk, the process of our At Risk study, findings by the At Risk Study Team, and recommendations following those findings.

Summary of State Requirements

[Wisconsin State Statute 118.153 \(2\) \(a\)](#) and Department of Public Instruction [PI 25.03 \(1 & 2\)](#) states that every school board shall identify the children who are enrolled in the school district who are at risk of not graduating from high school, and annually develop a plan describing how the school board will meet their needs. The statute also requires every board to make programs available to serve children at risk. As part of the district plan, each board must describe how the board will identify and meet the needs of the children identified to be at risk.

Currently, the State of Wisconsin identifies “children at risk” as pupils in grades 5 to 12 who are at risk of not graduating from high school because they are dropouts or meet 2 or more of the following criterion:

- Behind their age group in the number of high school credits attained
 - A student shall be determined to be behind in his or her age group in the number of high school credits attained if in grades 9 through 12 the student falls three (3) or more credits behind as evidenced by credits recorded in academic history.
- Two or more years behind their age group in basic skill levels
 - A student shall be determined to be behind two or more years than their age group in basic skill levels in Math and/or Reading as evidenced by grades and/or below basic status on the state assessment in Math and/or Reading.
- Habitual truants, as defined in §118.16(1)(a)
 - A student shall be determined to be “habitually truant” if all or part of five days in a semester without an acceptable excuse are missed.
- Parents
 - Teen parents; male and female and pregnant teens
- Adjudicated delinquents
 - A student is determined to be delinquent based on reports received from the court system. The list of adjudicated students is kept confidentially by pupil services office.
- 8th grade pupils whose score in each subject area on the examination administered under §118.30(1m)(am) 1. was below the basic level, 8th grade pupils who failed the examination under §118.30 (1m)(am) and 2. 8th grade pupils who failed to be promoted to the 9th grade

After review of student data, the At Risk Study Team, defined additional factors at a local level that they felt also are typical of students who are at risk of not graduating from high school. These factors include:

- Pupil Services identified areas (including, but not limited to):
 - Change in marital status of parents, including separation
 - Parent incarcerated
 - Death of a family member or close friend
 - Parent with AODA problems
 - Serious illness requiring hospitalization for student or family member
 - Chronic/severe behavior problems
- Homelessness

Additionally, the At Risk Study Team identified a large number of students (41) at the Elementary level that would qualify for At Risk programming based on criteria. As a result of this find, the team did also identify that local requirements for identification would extend through the elementary grades as well as State-required grade levels.

Local Study Process

To conduct the study, a team was assembled. The team was representative of staff K-12. In addition to the Director of Pupil Services, the team included Principals (2), Assistant Principals (2), Guidance Counselors (4), School Psychologists (2), Behavior Interventionists (2), Crossroads Teacher (1), and the Director of Instruction.

Study of State Requirements

In order to educate and begin our work grounded in state requirements, the District team worked with Beth Lewis, Department of Public Instruction Alternative Education Consultant, to provide an overview of the State requirements. Ms Lewis explained that the State of Wisconsin law requires individual districts to identify local areas of at-risk monitoring. These must include, but are not limited to, areas of monitoring identified by the State. With Ms. Lewis, the team focused on making recommendations regarding areas of monitoring for the School District of Fort Atkinson using guidance from the Department of Public Instruction. Using the areas recommended, the team began to inventory local data systems for identification, programs and services that correlate with each identification area.

Identification Systems Inventory / Data Collection

The Director of Pupil Services worked with the School District of Fort Atkinson Data Coordinator to determine what data was available from the elementary, middle school, and high school levels in each of the area of monitoring. This process uncovered where the District has appropriate systems in place to collect identification data and which areas were lacking identification systems.

If there was system is in place the team then evaluated if the data being collected is reliable. If there was not a system in place for a specific data point, the team then moved to determine what method or means would be needed to be put in place in order to begin collecting the data. Upon completion of data finalization using the information available, the At Risk Study team then tested the data system to spot check for accuracy regarding student identification.

The At Risk Team then used the data collected, to determine total need (number of students) by grade level (elementary, middle school, high school) by area monitored. Additionally, the team determined which numbers are valid and can be used for recommendations.

Programs and Services

Using all the criterions that were developed and number of students identified, the At Risk team then began analyzing programs and services that are currently available within the District by level (elementary, middle, high). The At Risk team, then began the process of going identifier by identifier to determine gaps in services and present challenges within existing services. Through this inventory of programs, it was determined that many of the programs, services, and strategies recommended by the [State](#) were unable to be implemented in Fort Atkinson due to insufficient staff or had been lost due to previous budget reductions. The team noted that there needs to be a higher level of coordination of the system overall rather than a collection of individual stand alone programs.

System Requirements

Additionally, within At Risk programming across the District there were system gaps in State-required areas such as parent notification. According to [Ch. PI 25.03 \(2\)\(d\)](#) the District is required to notify each pupil identified as at risk and his or her parent(s)/guardian(s) in writing at the time of identification. Per [PI 25.04](#), each school will send the notification before the school year begins. The notice shall include all of the following in the notifications:

1. The name/phone number of District contact.
2. A current description of the District's At Risk plan.
3. A statement of eligibility to be enrolled under the District plan for At Risk students.
4. A description of the District's At Risk programs available and how to participate in them.
5. A statement to inform the parent the their student may select one or more At Risk programs.
6. A description of the procedure for requesting that the student be enrolled in a specific District At Risk program and a recording of the date and time of the request.
7. A statement of the process a parent may use if they disagree with planned At Risk programming and services.

The District is also required to have a person who will identify and enroll students in At Risk programming, formalized process for identification of At Risk students including both State and local criterions, identify what accommodations can be made to support pupils' achievement and success in school, and establish a system for evaluating the student's progress. Currently, as a District, we are missing a formal process for all of these requirements.

It is also important to note the level of collaboration needed for students who are identified as At Risk. Many of these students are involved in interventions such as reading, math, or behavior, may possibly have a 504 plan due to an identified disability area, may be involved in community supports such as counseling, and/or may have county intervention through Child Protective Services or Juvenile Justice. The systems that are in place for other mandates often cross into At Risk programming as well.

Related Mandates

In addition to reviewing the student At Risk requirements, the At Risk Study Team additionally identified other State and Federal mandates that are often associated with students At Risk or the services provided to them. The Team noted that any improvements the District made in At-Risk would likely benefit the following areas:

- **Section 504 Requirements (1973)**: This is the part of the Federal civil rights law that prohibits discrimination against public school students with disabilities. That includes students with learning and attention issues who meet certain criteria. Much like an IEP, a 504 plan can help students with learning and attention issues learn and participate in the general education curriculum. A 504 plan outlines how a child's specific needs are met with accommodations, modifications and other services. These measures "remove barriers" to learning. Accommodations needed by students identified as 504 typically are implemented by Pupil Services staff and often are similar to the needs of at risk students. Section 504 student needs will take precedence for Pupil Services staff due to the legal ramifications of non-compliance with this law.
- **Response to Intervention (2010)**: Consistent with the Wisconsin Department of Public Instruction's philosophy of providing a multi-level system of support to at-risk students, the School District of Fort Atkinson (SDFA) also provides a multi-level system of support. Wisconsin defines a multi-level system of support as: "the practice of systematically providing differing levels of intensity of supports based upon student responsiveness to instruction and intervention." Often, services provided to at risk students, such as academic interventions, are directly tied to the RtI process. While this addresses some of those needs and programs, there are additional interventions specific to at risk that could/should be incorporated in the SDFA RtI process. It is also important to note that pupil services staff are directly involved, and at times, responsible for the RtI process. This is another responsibility that falls on our current pupil services staff.
- **Wisconsin Academic & Career Planning Requirements (Published 2015 - Must be Implemented by Fall 2017)**: Academic and Career Planning, or ACP, is a student-driven, adult-supported process in which students create and cultivate their own unique and information-based visions for post secondary success, obtained through self-exploration, career exploration, and the development of career management and planning skills. Students who are identified At Risk, often require significantly more resources to assure for access to post-secondary options. Often times, at risk students have never had exposure to a variety of professional options and true career exploration. Allowing for at risk students to have these experiences while overcoming personal and academic barriers can be difficult. Again, much of this new mandate will fall on pupil services staff.
- **Required State Testing**: The State of Wisconsin, through its Agenda 2017 initiative, has established required academic testing in grades 4K through grade 11 annually. This is in addition to required testing for ELL students or the new Civics test required for graduation. State testing takes place every month of the school year somewhere in the District. The School District of Fort Atkinson has utilized its pupil service staff to assist in coordination and completion of the complex and high stakes assessments as the responsibility associated with the test oversight and implementation exceeds the capacity of the administrator on his or her own. This additional duty also impacts time available for pupil services staff to implement at risk programming.

Study Findings

The At Risk team identified 157 students K-12 that are considered to be students At Risk of not graduating high school. The team documented the following conclusions and findings at the end of the study:

1. Inadequate Elementary and Middle School Program & Services - Based on the At Risk Study Team's review of the mandates required under PI 25 Admin. Code and section 118.153 Wisconsin Statutes in addition to other mandate areas such as Section 504, Rtl, Wisconsin Academic and Career Planning, and required State Testing needs, the team concludes that there is not adequate staff within Pupil Services at the Elementary and Middle schools. It is important to note that the American School Counselor Association (2007) recommended an ideal counselor/student ratio of 1 to 250. The Department of Public Instruction has acknowledged the recommended ratio of counselors-to-students established by the American School Counselor Association. The United States Department of Education also recommends a counselor-to-student ratio of 1 to 250 ([ESEA/NCLB Subpart 2 Section 5421](#)). The High School currently has 3.0 FTE of Guidance staff, while not completely in line with available guidance, it is a more acceptable level of counselor-to-student ratio than other levels Districtwide. While some programs are currently in place, the high student to counselor ratios at both the Elementary and Middle School buildings make availability of services inconsistent or unavailable and programming for students who are At Risk not possible.
2. Community / School Connection - There is not adequate staff within the area of Pupil Services at the Elementary and Middle schools to provide general and special education students and their families assistance with resolving social, emotional and behavioral problems. This is typically done through assessment, consultation with school staff and community providers, through development and implementation of behavior management plans, and providing indirect and direct services. Pupil Services staff help to bridge school, home and community to help students be as successful as possible. The At Risk Study Team identified that parent and students being able to access community these based supports has a great impact on whether a not a student will be eventually identified as being At Risk.
3. Academic Interventionist Support - At the Middle and High schools, there is not adequate intervention staffing to support students struggling with reading and math needs as defined by the State criteria. Currently, 101 students of the identified 157 students At Risk are two or more years behind their age group in basic skill areas of math, reading or written language. The District currently has in place a strong team of math and reading interventionists. While the current level of interventionist staff is not ideal, when reviewing other District needs, it was determined that this would be prioritized for further review once other staffing needs are in place.
4. At Risk Coordinator - Core Programming - As the At Risk Study Team reviewed the current staffing levels in the area of At Risk across the District, It was identified that designated staff in order to accomplish the tasks required within the law is not available given the additional mandate requirements listed above and other responsibilities currently in place. The At Risk Study Team identified that it would be appropriate for the District to look towards the addition of someone assigned coordination duties and oversight of the system. For some districts this means the establishment of an At Risk Coordinator. This person would be responsible for the creation and implementation of programming such as peer tutoring and targeted transition programs for incoming At Risk 6th and 9th grade students to the Middle School and High School. Additionally, this staff member would complete required enrollment into and tracking of At Risk programming. It is also anticipated that this staff member would working directly with kids on areas such as Alcohol and Other Drugs related concerns, mental health issues, 504 Coordination, and Freshman Academy in addition to current pupil services staff. While establishing a new position for this purpose is not feasible fiscally for the School District of Fort Atkinson now, it should be noted this will be additional duties added to existing staff.
5. Behavior Intervention - While looking at the efficiency of current Behavior Intervention staffing, it was identified that early intervention for students with the behavioral needs is critical to students making academic gains in this area. Additionally, research supports that idea that the earlier a student receives behavioral interventions the greater the likelihood for negative behaviors to be extinguished. The At Risk Study Team recommended additional staffing for Behavior Interventionists at the Elementary level. In an effort to provide equitable supports across the District, shifting all Behavior Interventionists to the Elementary level is suggested. While it would be ideal to

maintain Behavior Interventionist staffing at the secondary level, at this time, in order to reach minimal compliance for needed At Risk services and provide the greatest impact on students, it is recommended that Behavior Interventionist be re-allocated to the Elementary level. Behavior Interventionist staff will be available for consult at the Secondary level as needed to assist with the completion of Functional Behavioral Assessments, Behavior Intervention Plan creation, and supporting teachers through this process.

6. Concerns with Data Collection - It was identified that the District uses local data collection methods for universal screening (example - PMW data, report cards, etc) rather than a standardized (purchased) universal screener for identifying student academic and behavioral needs. While there was much discussion regarding concern of cost and instructional time for establishing a universal screeners given the level of testing already mandated by the State of Wisconsin. The committee notes that potential need for this is still present. The committee recommends further study specific to this area with recommendations including benefits associated as well as cost, time, etc.

Administrative Recommendations

At this time, Administration has reviewed the findings and prioritized District-wide needs. It is not feasible fiscally to address all of the At Risk Study Team recommendations at this time. It is recommended the District establish minimal compliance with the State requirement through reorganization and minimal addition of staff. It is recommended that the District review this structure annually to measure the impact of system improvements and staff additions. At this time, the District Administration is forwarding recommendations that will provide the essential elements required in order to maintain compliance with State Law. It should be noted that needs will need to be reviewed annually to determine if staffing levels are sufficient to meet State requirements in requirements and spirit.

Recommendation #1 = Establish Minimal Staffing Levels Sufficient to Provide At-Risk Services in Compliance With State Requirements (May Board of Education Meeting)

It is important to note that while At Risk Study Team identified many more areas of concern, Administration has determined staffing reallocations and additions that will secure minimal compliance to State requirements.

Administration recommends the re-allocation of the following FTE:

1.0 FTE School Psychologist (reallocation of vacancy - J. Kirt) to 1.0 FTE School Psychologist assigned to both FAHS and FAMS

1.0 FTE School Psychologist (reallocation of vacancy - K. Brown-Kurtz) to 1.0 FTE Guidance Counselor at FAMS

In September 2014, the responsibility for completion of Special Education re-evaluations was re-distributed to Special Education teaching staff. Duties relating to Early Childhood/4K initial evaluation case management duties were reassigned to the 4K Coordinator. Duties specific to External PBIS Coach were re-distributed to Behavior Interventionist staff. Prior to this time, these had all been duties assigned to the school psychologist. The result of these re-allocations allowed for the District to reduce 1.0 FTE School Psychologist at the Elementary level in 2014. This change has been watched closely over the past two years and the following positive effects have been found: Special Education staff who are familiar with their students/families are able to begin the re-evaluation process, duties have been reassigned to staff that are logical with their given roles (ie. 4K/EC evaluations with EC/4K Coordinator), and we are effectively and successfully completing more comprehensive testing/evaluations across the Elementary level. Given the success of this previous restructuring, it is recommended that a similar restructuring takes place at the secondary level. This would mean that some duties such as providing support to Crossroads students, initial file review of Special Education transfer students into the High School, individual 1:1 student support, Local Education Association Representative duties at IEP meetings, and bridging of services within the community will need to be reassigned. It is anticipated that the new Elementary Guidance Counselor will provide support to the Crossroads program due to their proximity to the

program. Special Education file review will be completed by the High School Special Education Department Chair prior to the start of each school year.

At this time, as a result of the At Risk Study recommendations for additional Guidance support at FAMS it is recommended that the District reduce 1.0 FTE School Psychologist at the Secondary level. It is further recommended that this FTE be re-allocated to fill the additional Guidance Counselor need at FAMS.

Administration recommends the addition of the following FTE:

1.0 Guidance Counselor at the Elementary (new position)

The At Risk Study Team identified a significant gap in services at the Elementary level in numerous areas. Areas of weakness include insufficient staffing for SAIG groups, PBIS Tier 2 intervention implementation with fidelity, crisis response, parent requests to meet with students that currently are unmet, bridging to outside counseling services, limited availability to social groups very limited, unavailability for "in-the-moment" teaching, and implementation of key components of Behavior Intervention Plans. Currently there is 1.0 total FTE of Guidance at the Elementary. As of April 2016, the current student-to-counselor ratio at the Elementary is 1: 1,183. This ratio is not enough to even come to a minimal level of compliance with At Risk programming for identified student need. Additionally, as a result of the high student to counselor ratio many State required mandates such as 504 Plan implementation are not being done with fidelity. This addition would allow for SAIG groups, PBIS Tier 2 interventions to be implemented, availability for crisis response, parent requests to meet with students regarding social and emotional needs to occur, bridging to outside counseling services, greater access to social groups, availability for "in-the-moment" teaching, and implementation of key components of Behavior Intervention Plans.

Administration recommends the following re-distribution of Behavior Interventionist FTE:

1.0 FTE Behavior Interventionist - Secondary to 1.0 Behavior Interventionist - Elementary

The At Risk Study Team talked at length about the efficacy of early intervention on students. It was noted that in order to move forward and assist students with significant behavioral needs the District should heed to the large body of evidence that early intervention programs can generate permanent changes in social behavior. As a result, Administration is recommending shifting Behavior Interventionist FTE to the Elementary level. It is anticipated with the addition of Guidance staff at the Middle School students who are currently being seen by Behavior Interventionist staff will be able to assist. Additionally, Behavior Interventionist staff will be available for consult at the Secondary level as needed to assist with the completion of Functional Behavioral Assessments, Behavior Intervention Plan creation, and supporting teachers through this process.

Recommendation #2 = Finalize Local At-Risk Identifiers and Coordinating Services (June / July)

The committee made recommendations regarding At-Risk indicators for use in the School District of Fort Atkinson. These include the required State identifiers as well as additional local areas of monitoring. These would be revisited after the amount of staff available for the 2016-2017 school year is established and ultimately finalized in the At Risk Plan to be considered and finalized by the Board of Education.

Recommendation #3 = Establish Local Systems and Structures for At-Risk. Allocate responsibilities for data collection, analysis and program supervision. (June / July)

Upon determination of the available staff for 2016-2017, the At Risk Study Team will reconvene and establish local systems and structures, as possible with available staffing, that need to be put into place in order to comply with minimal At Risk mandates.

Recommendation #4 = Complete At Risk Plan for Fort Atkinson (August Board of Education Meeting)

This plan assures that the Fort Atkinson School District is in compliance with Wisconsin Statute §118.153 relating to children At Risk of not graduating from high school by annually identifying the children At Risk and developing a plan to meet their needs. The plan includes identification strategies, articulation between levels, and supportive programs for Pre-K through grade 5, middle grades 6 through 8, and high school grades 9 through 12. The plan will also include specific strategies for parental notification and involvement. The District is currently out of compliance with the requirement to

annually approve this plan. The District will collaboratively develop this using the information from the previous two recommendations. The plan will be presented to the Board of Education in August for consideration.

Recommendation #5 = Develop At-Risk Policies and Administrative Rule (September / October)

The District will need to update At Risk policies and create new administrative rule that is in line with the newly created At Risk plan. This will be done after completion and approval of the District's At Risk plan. The current policies have not been considered since 1997.

Recommendation #6 = Implement Plan

Upon completion and approval of the District's At Risk Plan, there will need to be communication of new policies and procedures with staff, students, parents, and the community. This will involve professional development with staff to introduce the new structure, paperwork, and requirements. Parents will need to be provided notice of their student being identified as At Risk. Upon identification, students need to be formally enrolled into programs and services,

Recommendation #7 = Study Data Gaps and Make Recommendations

It is recommended that the District establish appropriate teams for areas referenced to study gaps in data and sources of data to determine additional needs. The At Risk Study Team may wish to review the following items upon reconvening: universal screeners for both academic and social/emotional functioning, review newly available State of Wisconsin testing information and ACT data. Using this information, the teams will make recommendations specific to adding additional data sources in the District.

Summary of Fiscal Impact of Additional / New FTE

School Psychologist Re-Allocation to 1.0 Guidance Counselor - FAMS

- Fiscal Impact = \$0 (reallocation)

Addition of 1.0 FTE Guidance Counselor - Elementary

- Fiscal Impact = \$70,000.00 total package

Re-Allocation of Behavior Interventionist to the elementary level

- Fiscal Impact = \$0

TOTAL REMAINING NEED = \$70,000.00