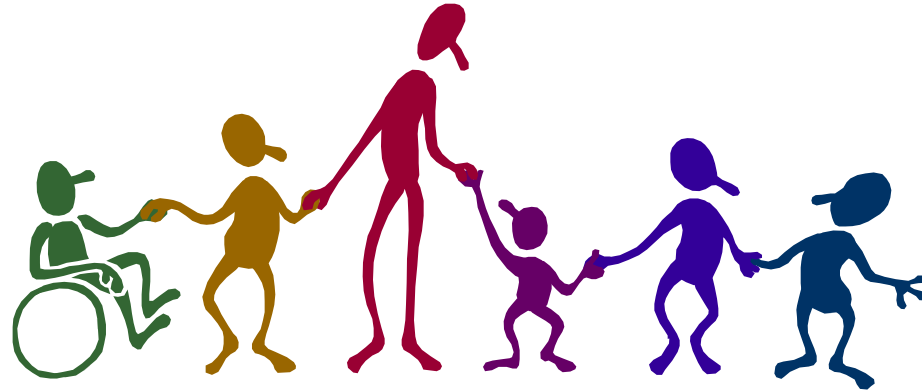


**NEW JERSEY STATE DEPARTMENT OF EDUCATION
DIVISION OF STUDENT SERVICES
OFFICE OF SPECIALIZED POPULATIONS**



**COMPREHENSIVE EQUITY PLAN
for the Academic Years
2015-2017**

FORMS AND INSTRUCTIONS
TO ASSIST SCHOOL DISTRICTS AND CHARTER SCHOOLS IN DEVELOPING
A COMPREHENSIVE EQUITY PLAN TO PROVIDE
EQUALITY AND EQUITY IN EDUCATIONAL PROGRAMS

**“MANAGING FOR EQUALITY AND EQUITY IN EDUCATION”
THREE-YEAR COMPREHENSIVE EQUITY PLAN**

Academic Years 2015-2016 through 2016-2017

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GENERAL INFORMATION

Purpose

On May 7, 2003 the State Board of Education adopted N.J.A.C. 6A:7, Managing for Equality and Equity in Education, which outlines responsibilities for achieving and maintaining compliance with all state and federal laws governing equity in educational programs. As a result, all schools, including charter schools, are mandated to develop a three-year Comprehensive Equity Plan (CEP). The first CEP covered the school years 2004-2007. The responsibility of each board of education of every public school district and charter school in New Jersey is to identify and correct all discriminatory and inequitable policies, programs, practices and conditions within or affecting their schools. The role of the New Jersey Department of Education (DOE) is to ensure that each district and charter school complies with equality and equity requirements, and to provide guidelines to accomplish that result.

The CEP enables district/charter schools to comply with all applicable laws, codes, and regulations, including, but not limited to, the following:

Federal Law

- Titles VI and VII of the Civil Rights Act of 1964
- Title IX of the Education Amendments of 1972
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- Individuals with Disabilities Education Act (I.D.E.A.) of 1997
- Equal Pay Act of 1973

State Law

- Article I, Paragraph 5 of the New Jersey State Constitution
- N.J.S.A.18A:36-20, Equality in Educational Programs
- N.J.S.A.10:5 New Jersey Law Against Discrimination
- New Jersey Administrative Code (N.J.A.C.) 6A:7
- N.J.S.A. 18A:35-1, History of the United States and New Jersey
- N.J.S.A. 18A:36-20, Prohibition of Discrimination

**SUMMARY STATEMENT
COMPREHENSIVE EQUITY PLAN ACHIEVEMENTS & BARRIERS - FY 2015-2017**

School Code:	
District/Charter Name:	GLOUCESTER CITY
City:	GLOUCESTER CITY
County:	CAMDEN

DIRECTIONS: Review the implementation strategies listed in your 2015-2017 Comprehensive Equity Plan (Please refer to pages 8 through of the 2015-2017 plan) to bring the district/charter school into compliance and indicate whether these strategies were implemented and the accomplishments achieved. In addition, please outline any barriers to the implementation or success of these strategies.

BOARD RESPONSIBILITIES:

STAFF DEVELOPMENT:

SCHOOL AND CLASSROOM PRACTICES:

- **EQUALITY AND EQUITY IN CURRICULUM**
- **EQUALITY AND EQUITY IN STUDENT ACCESS**
- **EQUALITY AND EQUITY IN GUIDANCE PROGRAM SERVICES**
- **EQUALITY IN PHYSICAL EDUCATION AND ATHLETIC PROGRAMS**

EMPLOYMENT AND CONTRACT PRACTICES:

Strategies: Each year, schools should collect documentation that can help them analyze and refine their implemented strategies based upon their desired impact. Good evaluation starts with a set of important questions that can be answered about the corrective action. In large part, those questions may be determined through a careful analysis of the goals of the CEP.

COMPREHENSIVE EQUITY PLAN

Academic Years 2015-2016 through 2016-2017

A. ACCOUNTABILITY:

1. Each district will review their approved comprehensive equity plan on an annual basis and submit a statement of assurance of its implementation to their respective county office of education and the Office of Specialized Populations no later than June 30 of each year. Statements of Assurance forms for each academic year are attached as Appendix D. Districts will also complete the *District Performance Review* in the New Jersey Quality Single Accountability Continuum (NJQSAC). For charter schools, annual progress will be reported in the Charter School Annual Report.
2. A sampling of district/charter schools may be reviewed on an annual basis for compliance of the approved Comprehensive Equity Plan.

B. SANCTIONS

1. As noted in 6A:7-1.9(f), “If the district board of education or charter school does not implement the comprehensive equity plan within 180 days of the approval date of the plan, or fails to report its progress annually, sanctions deemed to be appropriate by the Commissioner of Education or his/her designee shall be imposed, and may include action to suspend, terminate or refuse to award continued federal or state financial assistance, pursuant to N.J.S.A. 18A:55-2.”

AFFIRMATIVE ACTION TEAM MEMBERSHIP FORM

The following Affirmative Action Team (AAT) members and other stakeholders participated in the development of the needs assessment and Comprehensive Equity Plan. PLEASE NOTE: The AAT must consist of a minimum of three personnel and is comprised of diverse stakeholders. FORMS WITHOUT SIGNATURES WILL BE RETURNED TO THE DISTRICT.

DISTRICT/CHARTER SCHOOL NAME: GLOUCESTER CITY SCHOOL DISTRICT

NAME	TITLE	GRADE LEVEL (if applicable)	GENDER	SIGNATURE
Elizabeth A. Curry, Ed.D.	Affirmative Action Officer Director of Curriculum & Instruction	PreK-12	Female	
Mr. Joseph G. Rafferty	Superintendent	PreK-12	Male	
Ms. Nina Longer	Director of Special Services	PreK-12	Female	
Mrs. Patricia Null	Grants Management	PreK-12	Female	
Dr. Pat Gismonde	Athletic Director	7-12	Male	
Mr. William O'Kane	Principal Mary Ethel Costello School	4-6	Male	
Ms. Agatha Nagas	ESL	7-12	Female	
Ms. Colleen Ott	Speech	4-6	Female	
Mrs. Linda Stewart	Nurse	7-12	Female	
Ms. Margaret McDonnell	Business Administrator	PreK-12	Female	
Mr. Sean Gorman	Principal Jr-Sr. High School	7-12	Male	

APPENDIX A

COMPREHENSIVE EQUITY PLAN

DISTRICT/CHARTER SCHOOL

NEEDS ASSESSMENT

CHECKLIST

DISTRICT/CHARTER SCHOOL NEEDS ASSESSMENT CHECKLIST

For academic Years 2015-2016 through 2016-2017

TO ACHIEVE EQUALITY AND EQUITY IN EDUCATION PROGRAMS

DIRECTIONS: Indicate compliance by a checkmark (v). When a district is non-compliant, list the name of the school(s) not in compliance; specific areas identified as non-compliant MUST be addressed on the Comprehensive Equity Plan forms.

BOARD RESPONSIBILITIES	Compliant or Non-Compliant	Documentation or Evidence to Substantiate Compliance MUST include Board policy title, number and date of adoption	List name of non-compliant school(s) in the district
A. Adopt or re-adopt written equality and equity policies, requiring the following	v Compliant	All textbooks, materials etc are reviewed by curriculum supervisor and BOE for any discriminatory materials.	
1. Equality and Equity in School and Classroom Practices, that shall, as a minimum, do the following	v Compliant	All athletics and extra curricular activities are open to all students. All schools are handicap accessible.	
(a) Identify and address all forms of prejudice and discrimination in all district/charter school programs, practices, curricula, instructional materials and assessments.	v Compliant	All students are given every opportunity to succeed at their school and accommodations are made as needed.	
(b) Ensure equal access to all schools, facilities, programs, activities, and benefits for all students, regardless of race, creed, color, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status.	v Compliant	Schedule adjustments are made when necessary.	
(c) Provide equitable treatment for pregnant and married students.	v Compliant	All students are given every opportunity to succeed at their school and accommodations are made as warranted.	
(d) Prohibit or eliminate sexual harassment, and harassment.	v Compliant	Schedule adjustments are made when necessary.	
2. Equality in Employment and Contract Practices for all persons, regardless of race, creed, color, national origin ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status.	v Compliant	All positions are listed in newspapers, on line and in each building.	
3. The appointment of an Affirmative Action Officer (AAO) who can also serve as, or coordinate with, the district/charter school's Section 504 Officer and/or the district/charter school's Title IX Coordinator.	v Compliant	Dr. Elizabeth Curry is the AAO and 504 Officer for the District.	
4. Provide staff development to ensure that all equity requirements are in compliance with N.J.A.C. 6A:7-1.6.	v Compliant	Staff Development Agendas	
		Ongoing	
B. Authorize the Affirmative Action Officer team to develop a Comprehensive Equity Plan, implement the plan over a two-year period of time, submit an annual Statement of Assurance of its implementation and progress, and complete the district Performance Review in the NSQSAC. Chapter schools will report annual progress in the Charter School Annual Report.	v Compliant		

Documentation in schools and central office.

C. Collect and analyze AYP data for underperforming subgroups disaggregated by gender, race, ethnicity, limited English proficiency, special education, immigrant, date of enrollment, student suspension, expulsion, child study team referrals, Pre-K-12 Promotion/retention data, Pre-K-12 completion rates and re-examination and re-evaluation of classification and placement of student in special education programs if there is over representation within certain groups; staffing practices; quality of programs data; and stakeholder satisfaction data. Identify and school-level underperforming subgroups on annual AYP reports for state assessments.

√ Compliant

D. Adopt the Comprehensive Equity Plan (CEP) by board resolution, and facilitate and support implementation of the CEP, by undertaking or authorizing the following actions:

√ Compliant

In Progress

1. Publicize throughout the community the local Board's policies prohibiting bias, harassment, discrimination and segregation; and ensuring equality in education programs.

√ Compliant

Superintendent's newsletters, School newsletters, District Calendar, Gloucester City News, District Webpage
School Policies, Board Policies

2. Define the responsibilities of the AAO (Affirmative Action Officer/504 Officer, and/or Title IX Coordinator), required that the AAO be a certificated staff person and train the AAO to handle the district/charter school's equity responsibilities.

√ Compliant

District Calendar, District Webpage

3. Inform students, staff, and community of the name, officer address, and phone number of the district/charter school's AAO, and publicize the location and availability of the district/charter school's CEP, policy (ies), Grievance procedures and annual reports.

√ Compliant

4. Investigate and resolve discrimination complaints, grievances and incidents between students and teachers or among student, based on race, national origin, sexual orientation, gender, religion, English proficiency, socioeconomic status or disability.

√ Compliant

Affirmative Action Officer

5. Report on progress made on meeting the adequate yearly targets (as set by the Department of Education) for closing the achievement gap.

√ Compliant

Two-year instructional plan, NCLB reports

6. Authorize the AAO to conduct yearly equity training for all staff.

√ Compliant

Agendas of training sessions

DISTRICT/CHARTER SCHOOL NEEDS ASSESSMENT CHECKLIST

For academic Years 2015-2016 through 2016-2017

TO ACHIEVE EQUALITY AND EQUITY IN EDUCATION PROGRAMS

DIRECTIONS: Indicate compliance by a checkmark (v). When a district is non-compliant, list the name of the school(s) not in compliance; specific areas identified as non-compliant MUST be addressed on the Comprehensive Equity Plan forms.

STAFF DEVELOPMENT AND TRAINING N.J.A.C.6A:7-16 & N.J.S.A. 10:5	Compliant or Non- Compliant	Documentation or Evidence to Substantiate Compliance MUST include Board policy title, number and date of adoption	List name of non-compliant school(s) in the district
<p>A. Provide staff development which will be open to parents and community members, to identify and resolve problems associated with the student achievement gap and other inequities arising from prejudice regardless of race, creed, color, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status every school year, as follows:</p> <p>1. To all certificated (administrative and professional) staff.</p> <p>2. To all non-certificated (non-professional) staff</p>	v Compliant	<p>MANDATORY: Address this on the CEP Form Staff Development Program</p>	
	v Compliant	<p>MANDATORY: Address this on the CEP Form Staff Development Program</p>	
	v Compliant	<p>MANDATORY: Address this on the CEP Form Staff Development Program</p>	

DISTRICT/CHARTER SCHOOL NEEDS ASSESSMENT CHECKLIST

For academic Years 2015-2016 through 2016-2017

TO ACHIEVE EQUALITY AND EQUITY IN EDUCATION PROGRAMS

DIRECTIONS: Indicate compliance by a checkmark (v). When a district is non-compliant, list the name of the school(s) not in compliance; specific areas identified as non-compliant MUST be addressed on the Comprehensive Equity Plan forms.

SCHOOL AND CLASSROOM PRACTICES	Compliant or Non-Compliant	Documentation or Evidence to Substantiate Compliance MUST include Board policy title, number and date of adoption	List name of non-compliant school(s) in the district
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A. Equality and Equity in Curriculum

1. Ensure that the district/charter school's curriculum and instruction are aligned to the State's Core Curriculum Content Standards and addresses the elimination of discrimination and the achievement gap, as identified by underperforming school-level AYP reports for State assessment, by providing equality in educational programs and by providing opportunities for student to interact positively with others regardless of race, creed, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status. Areas covered include, but are not limited to the following:

v Compliant

(a) School climate/learning environment

v Compliant

GCS D maintains a safe and secure school climate/learning environment enforcing a district wide discipline code, the sue of Resource Officers in the buildings and requiring quality instruction everyday in all classrooms.

(b) Courses of study, including Physical Education

v Compliant

All courses of study are written by teachers and staff under the supervision of the Curriculum Director and the Superintendent. The Board of Education has final approval on all curriculum. All courses of study are directly aligned to the Core Curriculum Content Standards.

(c) Technology/software and audio-visual materials

v Compliant

All materials are reviewed by Curriculum Director, Superintendent as well as the Board of Education.

(d) Guidance and counseling, including sexual harassment and grievance procedures

v Compliant

All students are eligible for school counseling services at all schools throughout the district and the Affirmative Action Officer in the district is directly responsible for all sexual harassment and grievance procedures.

(e) Extra-curricular programs and activities	√ Compliant	All students are eligible for extra-curricular programs and activities provided they comply with NJSIAA rules and regulations as well as district attendance guidelines.
(f) Testing and other assessment	√ Compliant	All students in grades 3, 4, 5, 6, 7, 8 and 11 are tested annually on all state mandated tests: PARCC, NJ ASK. All students are tested on an assessment twice a year. All students are allowed to register for all courses in the Gloucester City School District. Standardized test scores, recommendations are considered to assist students in making the best selection possible regarding their academic course load.
(g) Reducing or preventing the under representation of minority, female and male students in all classes and programs	√ Compliant	Every attempt is made to include multicultural education and practices across the curriculum in relation to the Core Curriculum Content Standards.
2. Include Multicultural Education content and practices across the curriculum	√ Compliant	GCS D includes the Amistad in its history courses as well as the customs and traditions from various cultures in relationship to the Core Curriculum Content Standards.
3. Ensure that instruction in African-American History, including the Amistad, and the history of other cultures is taught as part of the history of the United States	√ Compliant	Instruction of the Holocaust and other genocides are covered throughout the elementary and secondary schools in relation to the CCCS.
4. Include instruction on the Holocaust and other genocide in the curriculum for elementary and secondary school students	√ Compliant	All students are allowed to register for all courses in the GCS D. Standardized test scores, previous academic performance, and teacher recommendations are considered to assist students in making the best selection possible with regards to their academic load.
(a) Ensure that minority and female students are not disproportionately represented in gifted and talented or accelerated/advanced courses, including math and science.	√ Compliant	Student discipline has a clearly defined Student Discipline Code. It contains specific penalty for specific discipline infraction. All offenses are treated equally and has been adopted by the Board of Education. All students with special needs are disciplined according to their 504 or IEP.
(b) Ensure that minority and male students are not disproportionately represented in detentions, suspensions, expulsion, dropouts, or special need classifications.	√ Compliant	All students have equal and barrier free access to all schools and classroom facilities in the Gloucester City School District.
(c) Ensure equal and bias-free access for all students to computers, computer classes, vocational ed classes, and technologically-advanced instructional assistance, regardless of race, creed, color, national origin, ancestry, age, marital status, affectional/sexual orientation, gender, religion, disability or socioeconomic status.	√ Compliant	

(d) Ensure that all limited English-proficient students have equal and bias-free access to all school programs and activities.	√ Compliant	The district provides ESL teachers to all limited English proficient students along with after school tutoring and the extended school day.
(e) Ensure that all students with disabilities have equal and bias-free access to all school programs and activities.	√ Compliant	All students with disabilities have equal access to all school programs and activities throughout the district.
(f) Ensure that all school's registration procedures are in compliance with the State and Federal regulations.	√ Compliant	All students who reside in Gloucester City are entitled to enroll in our public schools. According to State and Federal regulations. We have three schools. One grades PreK-3rd, one 4-6 and one 7-12. Consequently all students have an equal opportunity for equitable services.
B. Equality and Equity in Student Access.	√ Compliant	All students have equal and barrier free access to all schools and classroom facilities in the Gloucester City School District.
1. Ensure equal and barrier-free access to all school and classroom facilities.	√ Compliant	GCSD only has one elementary, one middle and one Jr-Sr high school so that all students have equal access to all schools. All students are allowed to register for all courses in GCSD. Standardized test scores, previous academic performance, and teacher recommendations are considered to assist students in making the best selection possible regarding their academic course load.
2. Attain minority representation, including racial and ethnic balance, within each school which approximates the district/charter school's overall minority racial and ethnic representation.	√ Compliant	GCSD has one elementary, one middle, and one Jr-Sr high school. Students have equal access to all schools.
3. Refrain from locating new facilities in areas that will contribute to imbalanced, isolated, or racially identifiable school enrollments.	√ Compliant	GCSD has one elementary, one middle, and one Jr-Sr high school. Students have equal access to all schools.
4. Ensure that students are not separated or isolated by race, creed, color, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status, resulting in inappropriate placement within schools, courses, classes, programs, or extra-curricular activities.	√ Compliant	GCSD only has one elementary, one middle and one Jr-Sr high school so that all students have equal access to all schools. All students are allowed to register for all courses in GCSD. Standardized test scores, previous academic performance, and teacher recommendations are considered to assist students in making the best selection possible regarding their academic course load.

5. Utilize a State approved language proficiency measure on an annual basis for determining the special needs of language-minority students.	√ Compliant	The district uses and Access for ELL Language assessment scale for placement and exit of LEP students into the ESL program. The LAS is administered annually to determine English language programs based on this assessment the ESL teacher determines appropriate modifications for next year. The CST reviews all IEP's annually to continue or change accommodations for each individual student.
6. Utilize bias-free measures for determining the special needs of students with disabilities	√ Compliant	Program, 21st CCLC, school Psychologist, ESL teacher, Speech Language Therapist, Physical and Occupational Therapist.
7. Ensure that support services (e.g. school-based youth services, health care, tutoring, and mentoring) are available to all students, including limited English-proficient student.	√ Compliant	Pregnant students are allowed to continue at GHS until their doctor informs the school otherwise. The student is provided with a home bound instructor until she is release by her doctor to return to school.
8. Ensure that all pregnant students are permitted to remain in regular school programs and activities. If not permitted to attend school by her doctor, ensure that equivalent instruction is provided to that student.	√ Compliant	
C. Equality and Equity in Guidance Programs and Services	√ Compliant	
1. Access to adequate and appropriate counseling services for all students, including females, minority students, limited English proficient students, non-college bound students, and student with disabilities.	√ Compliant	At the Jr-Sr High School students are assigned a counselor alphabetically. Every student in the GCSD has equal access to counselors at their respective schools.
2. The presentation of full range of possible career, professional, and/or vocational choices for all students, including careers in the science and technology industries and nontraditional careers.	√ Compliant	
3. Guidance Counselors are not using biased materials.	√ Compliant	The Guidance staff at GCSD does not use any biased materials.
D. Equality and Equity in Physical Education	√ Compliant	The physical education and health courses in the GCSD are directly aligned with the core content standards and all classes are co-educational.
1. All instructional activities are equitable and are co-educational.	√ Compliant	All courses and classes offered in the GCSD are co-educational.
E. Equality and Equity in the Athletic Program	√ Compliant	All athletic programs receive equitable funding across the board.
1. An interest survey has been completed in the last three years to ensure equitable opportunities for female and male students to participate in athletics.	√ Compliant	An interest survey was completed during the 2014-2015 school year of students in grades 7-12
2. Ensure relatively equal numbers of varsity and sub-varsity teams for male and female students.	√ Compliant	The GCSD takes great pride in providing equal and quality programs for both male and female athletes. Male and female teams have won numerous championships over the past decade. Currently there are 15 Varsity and JV sports for females.

3. Ensure equitable scheduling of night games, practice times, locations, and number of games for male and female teams.	√ Compliant	All Scheduling of games and practice is done fairly and equally amongst male and female athletic teams. Most times and dates of games are determined by the Tri County Conference as well as the NJSIAA.
4. Ensure that athletic programs receive equitable treatment that includes staff salaries, purchases and maintenance of equipment, etc.	√ Compliant	All athletic teams receive equitable treatment in regards to purchasing equipment, staff salaries and the availability of the athletic trainer.
5. Provides comparable facilities for male and female teams.	√ Compliant	All athletes in the GCSD share all athletic spaces, fields and training facilities.

DISTRICT/CHARTER SCHOOL NEEDS ASSESSMENT CHECKLIST

For academic Years 2015-2016 through 2016-2017

TO ACHIEVE EQUALITY AND EQUITY IN EDUCATION PROGRAMS

DIRECTIONS: Indicate compliance by a checkmark (v). When a district is non-compliant, list the name of the school(s) not in compliance; specific areas identified as non-compliant MUST be addressed on the Comprehensive Equity Plan forms.

EMPLOYMENT/CONTRACT PRACTICES N.J.A.C.6A:7-18; Title VII, Civil Rights Act of 1964; Title IX, Education Amendments of 1972; N.J.S.A. 10:5, Equal Pay Act 1973	Compliant or Non-Compliant	Documentation or Evidence to Substantiate Compliance MUST include Board policy title, number and date of adoption	List name of non-compliant school(s) in the district
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A. Ensure that the district/charter schools provide equal and bias-free access to all categories of employment as follows

1. Utilize equitable practices that correct imbalance and isolation based on race, national origin, sexual orientation, and gender among that district/charter school's certificated and non-certificated staff and within every category of employment, including administration.

v Compliant

Openings are posted in area metro newspapers also on NJ Jobs

2. Target under-utilized groups in every category of employment.

v Compliant

Local papers are used.

3. Ensure that the district/charter school's employment application and pre-employment inquires conform to the guidelines of the New Jersey Division on Civil Rights.

v Compliant

All state that the GCSD is an equal opportunity employer.

4. Monitor promotions and transfer to ensure non-discrimination.

All jobs are posted within each school year.
Contractual.

5. Ensure equal pay for equal work among members of the district/charter school's staff regardless of race, creed, color, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability or socioeconomic status.

None that we are aware of at this time

B. Ensure that the district/charter school does not enter into, or maintain, contracts with persons, agencies, or organizations that discriminate in employment or in the provision of benefits or services, on the basis of race, creed, color, national origin, ancestry, age, marital status, affectional or sexual orientation, gender, religion, disability, or socioeconomic status.

C. Equality in Employment and Contract Practices for all persons, regardless of race, creed, color, national origin, disability, or socioeconomic status.

We state, post and practice the fact that we are an equal opportunity employer.