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HUMAN RESOURCES  
2020 NOV 30 PM 2:55  
SARASOTA COUNTY

November 23, 2020

Brennan Asplen  
Superintendent  
Sarasota County School District  
1960 Landings Boulevard  
Sarasota, Florida 34231-3365

Dear Superintendent Asplen:

Federal and state laws, rules and regulations require that institutions receiving federal financial assistance take steps to prohibit discrimination and harassment on the bases of race, sex, national origin and disability in the provision of and access to educational programs, services and activities, as well as in their employment practices. Each institution must develop plans to demonstrate compliance, and the Florida Department of Education (FDOE) must ensure that institutions comply with all requirements. The district's Florida Educational Equity Act (FEEA) update provides FDOE with the information required to evaluate the district's efforts in achieving compliance with the requirements.

The Office of Equal Educational Opportunity (OEEO) has received and reviewed your 2019-20 FEEA update. The FEEA update comprises disaggregated data on student participation rates in Advanced Placement, Dual Enrollment and other Level 3 courses, and the district's efforts to improve academic achievement and access to high-quality instruction for minority students, particularly minority male students. The FEEA update also includes a review of the district's civil rights policies and procedures; the results of the district's comprehensive review of its athletic programs; employment data for administrative, instructional and guidance positions; information on single-gender schools or classes, where applicable; and details of the district's program(s) available to pregnant and parenting students.

Information submitted in the district's 2019-20 FEEA update was used to generate the attached 2020-21 Monitoring Work Plan (MWP), which contains a summary of your district's progress from 2015-16 to 2019-20. This MWP should be reviewed for comments, recommendations and submission deadlines, as it will be utilized by OEEO to monitor compliance and to record progress in addressing identified equity issues. Requested information should be submitted to Lydia Southwell, Office of Equal Educational Opportunity, Florida Department of Education, 325 W. Gaines Street, Room 644C, Tallahassee, Florida 32399.

JACOB OLIVA  
CHANCELLOR OF PUBLIC SCHOOLS

Superintendent Brennan Asplen  
November 23, 2020  
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The Office of Equal Educational Opportunity is available to provide technical assistance upon request. If you have any questions, please call OEEO at 850-245-0511.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Oliveira', written over a faint circular stamp.

Jacob Oliveira  
Chancellor of Public Schools

JO/ls

Attachment

cc: Al Harayda, Sarasota County School District Equity Coordinator  
Lydia Southwell, Director of the Office of Equal Educational Opportunity

**2020-21**  
**MONITORING WORK PLAN**  
**FOR**  
**COMPLIANCE WITH THE FLORIDA EDUCATIONAL EQUITY ACT (FEEA)**

The attached has been developed to assist you in planning and implementing corrective actions or in evaluating the methods and strategies identified as a result of the review of your 2019-20 FEEA Update. The topics listed in the first column are those identified during the review process and reflect the requirements specified in section 1000.05, Florida Statutes, and Rules 6A-19.001 – 6A-19.010, Florida Administrative Code.

**Column 1. *Description of Agency Action Needed or Clarification Requested***

- When a submitted method or strategy does not appear to address the identified under-representation, the district is requested to develop and implement targeted methods and strategies specific to the program.
- When a submitted method or strategy does not contain clear action steps, implementation timelines or accountability measures, a recommendation is made for the omitted information to be submitted.

**Column 2. *Date Due***

- Specifies timelines when the information requested in Column 1 should be submitted to the Office of Equal Educational Opportunity (OEEO).

**Column 3. *Contact Person***

- Identifies the person responsible for each action listed in Column 1; this should be the person you want us to contact as we monitor implementation.

**Column 4. *Monitoring Record***

- This column is used by OEEO to monitor implementation.

**MODIFICATIONS TO ITEMS INCLUDED IN THE WORK PLAN SHOULD BE SENT TO**

Lydia Southwell  
Educational Policy Development Director  
Office of Equal Educational Opportunity  
325 West Gaines Street, Suite 644C  
Florida Department of Education  
Tallahassee, Florida 32399-0400  
Telephone: 850-245-9556

**2020-21 MONITORING WORK PLAN  
BASED ON THE 2019-20 FEEA UPDATE**

**Agency: SARASOTA COUNTY SCHOOL DISTRICT**

Description of Agency Action Needed or Clarification Needed	Due Date	Contact Person	MONITORING RECORD: Include contact date and type, person contacted, materials reviewed and evaluation
<p><b>PART I: PROCEDURAL REQUIREMENTS</b></p> <p>A number of procedural requirements to ensure equal educational opportunities are included in federal and state civil rights rules, regulations and guidelines. These requirements include the annual and continuous notices of nondiscrimination; the designation of person(s) to coordinate compliance with federal and state regulations prohibiting discrimination and notification of the identity of, and contact information for, the person(s); and the adoption and availability of grievance or complaint procedures for use by students, employees and applicants for admission and employment.</p> <p><b>A.</b> The following policies and procedures were submitted to OEE0. Please notify OEE0 of any changes to these policies.</p> <p><b>1. Policy of Nondiscrimination</b> Policy 2.71, Policy Against Discrimination – Students; Policy 2.72, Policy Against Discrimination – Employees/Applicants and Policy 2.81, Unlawful Discrimination Prohibited.</p> <p><b>Action Required:</b> The district should review its policies and procedures to ensure that they are aligned with the new Title IX regulations. The district should also train staff on the implementation of its policies.</p> <p><b>2. Grievance or Complaint Procedure(s)</b> Policies 2.71 and 2.72 includes grievance procedures for complaints of discrimination and harassment.</p> <p><b>Action Required:</b> The district should review its grievance and harassment policies and procedures to ensure that they are aligned with the new Title IX regulations.</p> <p><b>3. Harassment Policy</b> Policy 2.71, Policy Against Discrimination – Students; and Policy 2.72, Policy Against Discrimination – Employees/Applicants.</p> <p><b>Action Required:</b> The district should review its grievance and harassment policies and procedures to ensure that they are aligned with the new Title IX regulations. The district should also train staff on the implementation of its policies.</p> <p><b>B.</b> The following nondiscrimination notices were submitted by the district.</p>			<p>Statutes and regulations that establish the policy and procedure requirements:</p> <p>Rule 6A-19.010(1)(f), F.A.C.; Title IX: §106.9; Section 504: §104.8; ADA: §35.106; Vocational Guidelines: §IV-A; and Age Discrimination Act: §110.10.</p> <p>Rule 6A-19.010(1)(h), F.A.C.; Title IX: §106.8(b); Section 504: §104.7(b); ADA: §35.107(b); and Age Discrimination Act: §110.25(c).</p> <p>Rule 6A-19.008, F.A.C.; Title IX: §106.31; Title VII: §1604.11 and §1606.8; and Age Discrimination Act: §110.10.</p>

**2020-21 MONITORING WORK PLAN  
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**Agency: SARASOTA COUNTY SCHOOL DISTRICT**

Description of Agency Action Needed or Clarification Needed	Due Date	Contact Person	MONITORING RECORD: Include contact date and type, person contacted, materials reviewed and evaluation
<p><b>1. Annual Notification of Nondiscrimination for Vocational Education Programs</b> The annual notice of nondiscrimination is published on the Suncoast Technical College's webpage. A summary listing of programs for the career and technical education (CTE) are provided on the webpage, which includes the contact information for the person responsible for receiving complaints of discrimination or harassment, and an assurance that lack of English language skills would not be a barrier to participation in CTE programs. However, the annual notice was not posted on the high schools or district's websites. And, to notify students, parents and the general public of the CTE offerings at the high schools. The district did not provide evidence that the annual notice of nondiscrimination was published in any other medium that reaches students, parents, employees and the general public prior to the beginning of the school year for the CTE offerings at the high schools.</p>	12/18/20	AJ Harayda	Vocational Guidelines: §IV-O.
<p><b>Action Required:</b> The district should provide documentation of the annual notice of nondiscrimination being published prior to the beginning of the school year. The district should continue to publish and disseminate the annual notice in languages with a community of minority persons with limited English language. The district should continue to ensure that the annual notice of nondiscrimination for CTE programs is published and disseminated annually to students, parents, employees and the general public prior to the beginning of the school year as required by the Vocational Guidelines: §IV-O.</p>			Rule 6A-19.010(1)(f-g), F.A.C.; Title IX: §106.8(b) and §106.9; Section 504: §104.8; ADA: §35.106 and §35.107(a); Age Discrimination Act: §110.25(b); and Boy Scouts Act: §108.9.
<p><b>2. Continuous Notification of Nondiscrimination</b> The district publishes its continuous notices of nondiscrimination on its website and in the Equity Policy Manual, which includes contact information for the person responsible for handling complaints of harassment and discrimination and a statement ensuring equal access to facilities for the Boy Scouts of America. The district also submitted sample copies of promotional and recruitment materials including the continuous notice of nondiscrimination.</p>			
<p><b>Action Required:</b> The district should continue to ensure that the continuous notice of nondiscrimination is published and distributed regularly to students, parents, employees and the general public as outlined in Title IX.</p>			
<p><b>C. Notice for Availability of Reasonable Accommodations to Applicants for Employment.</b> The district's Human Resources website includes the reasonable accommodations statement and contact information for qualified applicants with disabilities to request assistance during the application and interview process.</p>			
<p><b>Action Required:</b> The district should continue to ensure that the notice for reasonable accommodations is published in areas accessible to applicants.</p>			

**2020-21 MONITORING WORK PLAN  
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**PART II: INCOMPLETE ITEMS OR PENDING ACTIONS**  
N/A.

**PART III: STUDENT PARTICIPATION**

**EVALUATION OF METHODS AND STRATEGIES:**

Rule 6A-19.010(1)(c), F.A.C., requires institutions to develop and implement methods and strategies to increase participation in designated programs and courses for students from underrepresented groups. Data for Part III – Student Participation is collected by the Florida Department of Education data warehouse. To provide meaningful results and to protect the privacy of individual students, data are displayed only when the total number of students in a group is at least 10 and when the performance of individuals would not be disclosed. Data for groups less than 10 are displayed with an asterisk (\*).

- **Grades 9-12: Advanced Placement (AP, IB and AICE)**  
The state conducted an analysis of student enrollment in Advanced Placement, IB and AICE courses from 2015-16 to 2019-20.

**Enrollment Data Submitted:** Yes. Overall enrollment increased from 27 percent to 41 percent.

**Evidence of Success:**

Enrollment in Advance Enrollment Courses			
Group	2015-16	2019-20	Change in Enrollment Gap
White	30%	42%	
Black	8%	33%	Decreased from 22 to 9 percentage points
Hispanic	20%	35%	Decreased from 10 to 7 percentage points
White M	26%	37%	
Black M	6%	27%	Decreased from 20 to 10 percentage points
Hispanic M	18%	32%	Decreased from 8 to 5 percentage points
Group	2016-17	2019-20	Change in Enrollment Gap
White	35%	37%	
ELL	6%	18%	Decreased from 26 to 19 percentage points

**2020-21 MONITORING WORK PLAN  
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**Description of Agency Action Needed or Clarification Needed**

**Due Date**

**Contact Person**

**MONITORING RECORD: Include contact date and type, person contacted, materials reviewed and evaluation**

**Strategies Submitted:** The district submitted strategies to increase enrollment of minority and ELL students enrolled in AP, IB, AICE courses for the 2020-21 school year.

**Accountability Measures:** The district's goal is to increase the enrollment for black and Hispanic students by 1 percentage point for each group by the 2020-21 school year. The district did not submit accountability measures for ELL students.

- **Grades 9-12: Dual Enrollment (DE)**  
The state conducted an analysis of student enrollment in Dual Enrollment (DE) courses from 2015-16 to 2019-20.

**Enrollment Data Submitted:** Yes. Overall enrollment decreased from 27 percent to 16 percent.

**Evidence of Success:**

Enrollment in Dual Enrollment Courses			
Group	2015-16	2019-20	Change in Enrollment Gap
White	11%	16%	
Black	4%	11%	Decreased from 7 to 5 percentage points
Hispanic	9%	13%	Increased from 2 to 3 percentage points
White M	10%	13%	
Black M	2%	9%	Decreased from 8 to 4 percentage points
Hispanic M	7%	11%	Decreased from 3 to 2 percentage points
Group	2016-17	2019-20	Change in Enrollment Gap
White	11%	16%	
ELL	2%	4%	Increased from 9 to 12 percentage points

**Strategies Submitted:** The district submitted strategies to increase in dual enrollment courses for the 2020-21 school year.

**Accountability Measures:** The district's goal is to increase the enrollment for all black and Hispanic students by 1 percentage point, for each group enrolled in dual enrollment for the 2020-21 school year. The district did not submit accountability measures for ELL students.

**2020-21 MONITORING WORK PLAN  
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**Due Date**

**Contact Person**

**MONITORING RECORD: Include contact date and type, person contacted, materials reviewed and evaluation**

- Grades 9-12: All Level 3 courses (including AP, IB, AICE, DE and honors)**  
The state conducted an analysis of student enrollment in all advanced courses, including DE, AP, IB, AICE and other Level 3 courses from 2015-16 to 2019-20.

**Enrollment Data Submitted:** Overall enrollment increased from 60 percent to 73 percent.

**Evidence of Success:**

Enrollment in All Advanced Courses		
Group	2015-16	2019-20
White	68%	76%
Black	31%	57%
Hispanic	49%	69%
White M	62%	73%
Black M	27%	48%
Hispanic M	46%	65%
Change In Enrollment Gap		
Group	2016-17	2019-20
White	70%	76%
ELL	32%	47%
Change In Enrollment Gap		
		Decreased from 38 to 29 percentage points

**Strategies Submitted:** Yes. The district submitted strategies to increase enrollment for minority students enrolled in level 3 courses for the 2020-21 school year.

**Accountability Measures:** The district's goal is to increase the enrollment for all black and Hispanic students by 1 percentage point, for each group by the end of the 2020-21 school year. The district did not submit accountability measures for ELL students.

**Action Required for Part III:** Overall the district has shown some increases in minority enrollment for advanced courses, but net gaps persist, especially for black students. The district should establish accountability measures for ELL students, and implement greater accountability measures for minority significant to close enrollment gaps. Updated strategies and accountability measures should be submitted to OEEEO by December 18, 2020.

12/18/20

AJ Harsyda



**2020-21 MONITORING WORK PLAN  
BASED ON THE 2019-20 FEEA UPDATE**

**Agency: SARASOTA COUNTY SCHOOL DISTRICT**

Description of Agency Action Needed or Clarification Needed	Due Date	Contact Person	MONITORING RECORD: Include contact date and type, person contacted, materials reviewed and evaluation
<p><b>PART IV: GENDER EQUITY IN ATHLETICS</b>                      Title IX and Rule 6A-19.004, F.A.C., require schools to provide equitable equipment and supplies, scheduling, travel, coaching, facilities, training, publicity and promotion, support services, funding, and opportunities for proportionate participation in interscholastic sports.</p> <p><b>Athletics Compliance Verification</b>                      The 2019-20 Annual Update included Individual Compliance Verification Forms for each middle and high school signed and dated by the superintendent. The Compliance Verification Forms indicate that all of the middle schools are in compliance with Title IX regarding female participation in athletics, while all of the high schools are out of compliance. The district also submitted athletic participation monitoring forms for each of the schools.</p> <p><b>Corrective Action Plans:</b> The district submitted corrective action plans to address underrepresentation of females in athletics for Booker, Riverview, Sarasota and Venice High Schools that are out of compliance.</p> <p><b>Note:</b> North Port High School included participation in competitive cheerleading, which is not accepted by the Office of Civil Rights (OCR) towards Title IX compliance at this time. Therefore, those numbers were subtracted from the calculation.</p> <p><b>Action Required:</b> The district should continue to monitor participation in athletics. The schools should submit updates to the corrective action plans in the 2020-21 Equity Update. Additionally, the district should submit only one Athletic Compliance Verification Form signed by the Superintendent indicating whether or not the district is in compliance.</p> <p><b>PART V: EMPLOYMENT EQUITY</b>                      Title VI and the Florida Educational Equity Act allow school districts to implement affirmative actions to overcome the effects of prior discrimination or conditions which resulted in limiting participation by persons of a particular color, race or national origin. OEEO reviewed 2018-19 employment data for the district's administrative and instructional positions to identify underrepresentation of minority employees.</p> <p><b>Employment Data Submitted:</b> Yes. Black and Hispanic employees are underrepresented in administrative and faculty positions, while male employees are underrepresented in faculty positions.</p>	<p>2020-21 Equity Update</p>	<p>Al Hareyda</p>	

**2020-21 MONITORING WORK PLAN  
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<p><b>Strategies to Address Underrepresentation:</b> The district did not submit strategies to address underrepresentation of minority employees in administrative and faculty positions.</p> <p><b>Action Required:</b> The district should develop strategies to address underrepresentation of minority and male employees in administrative and faculty positions. Strategies should be submitted in the 2019-20 Equity Update.</p> <p><b>PART VI: SINGLE-SEX SCHOOLS AND CLASSES</b> N/A.</p> <p><b>PART VII: PREGNANT AND PARENTING STUDENTS</b> The district was asked to provide information regarding educational access for pregnant and parenting students to ensure that they are provided comparable educational services in compliance with the requirements of Title IX and Section 1003.54, F.S.</p> <p><b>Does the district operate separate programs for pregnant/parenting students? The district reported that pregnant or parenting students may remain in their zoned school or attend one of the two center schools for pregnant and parenting students. Riverview and North Port High Schools offer on-site childcare and other services are provided. Students may also attend Suncoast Technical Center and/or take on-line learning courses. Ancillary services and transportation are provided for all pregnant and parenting students in the Teenage Parent Program.</b></p> <p><b>Action Required:</b> The district should continue to ensure that pregnant and parenting students are given access to the same curricular and extra-curricular activities and programs as other students including access to career and technical education programs.</p>	2020-21 Equity Update	Al Harayda	
	2020-21 Equity Update	Al Harayda	