The University of the State of New York
The State Education Department

DIAGNOSTIC TOOL FOR SCHOOL AND DISTRICT EFFECTIVENESS (DTSDE)

BEDS Code	14240010000
District	Olean City School District
District Address	410 W. Sullivan St., Olean NY 14760
Superintendent	Colleen Taggerty, Ed. D
Date(s) of Review	December 5, 2013
Schools Discussed in this Report	Olean Intermediate – Middle School

District Information Sheet											
District Grade Configuration	PK-12			Total Student Enrollment		2347	Title 1 Population		15%	Attendance Rate	95%
Free Lunch	49%	Reduced Lunch	9%	Student Sustainability		TBD	Limited English Proficient		0%	Students with Disabilities	15.7%
Racial/Ethnic Origin of District Student Population											
American Indian or Alaska Native	1%	Black or African American	7%	Hispanic or Latino	2%	Asian or Native Hawaiian /Other Pacific Islander	3%	White	84%	Multi-racial	2%
Personnel											
Number Years Superintendent Assigned/Appointed to District	6	Number of Deputy Superintendents	0	Average Years Dep. Superintendents in Role in the District		NA				# of Directors of Programs	5
% of Teachers with No Valid Teaching Certificate in District	0%	% Teaching Out of Certification in District	0%	% Teaching with Fewer Than 3 Yrs. Of Exp. In District		3%				Average Teacher Absences in District	8.2
Overall State Accountability Status (Mark applicable box with an X)											
District in Good Standing		Focus District	X	Number of Focus School Identified by District		1	Number of SIG Recipient Schools		1	Number of Schools in Status	1
ELA Performance at levels 3 & 4	E/M – 26% S – 75%	Mathematics Performance at levels 3 & 4	E/M – 18% S – 72%	Science Performance at levels 3 & 4		E/M – 88%	4 yr. Graduation Rate (for HS only)		79%	6 yr. Graduation Rate (for HS only)	83%

Did Not Meet Adequate Yearly Progress (AYP) in ELA					
E/M	**S**		**E/M**	**S**	
		American Indian or Alaska Native			Black or African American
		Hispanic or Latino			Asian or Native Hawaiian/Other Pacific Islander
X		White			Multi-racial
X		Students with Disabilities			Limited English Proficient
		Economically Disadvantaged			
Did Not Meet Adequate Yearly Progress (AYP) in Mathematics					
		American Indian or Alaska Native	X		Black or African American
		Hispanic or Latino			Asian or Native Hawaiian/Other Pacific Islander
X	X	White			Multi-racial
X		Students with Disabilities			Limited English Proficient
X		Economically Disadvantaged			
Did Not Meet Adequate Yearly Progress (AYP) in Science					
		American Indian or Alaska Native			Black or African American
		Hispanic or Latino			Asian or Native Hawaiian/Other Pacific Islander
		White			Multi-racial
X		Students with Disabilities			Limited English Proficient
		Economically Disadvantaged			
Did Not Meet Adequate Yearly Progress (AYP) for Effective Annual Measurable Achievement Objective					
		Limited English Proficiency			

Tenet 1 - District Leadership and Capacity: The district examines school systems and makes intentional decisions to identify and provide critical expectations, supports and structures in all areas of need so that schools are able to respond to their community and ensure that all students are successful.

#	Statement of Practice	H	E	D	I
1.1	The district has a comprehensive approach for recruiting, evaluating and sustaining high-quality personnel that affords schools the ability to ensure success by addressing the needs of their community.	X			
1.2	The district is organized and allocates resources (financial, staff support, materials, etc.) in a way that leads to appropriate levels of support for schools based on the needs of the school community, which promotes school improvement and success.			X	
1.3	The district leadership has a comprehensive explicit theory of action about school culture that robustly communicates high expectations for addressing the needs of all constituents.			X	
1.4	The district has a comprehensive plan to create, deliver and monitor professional development in all pertinent areas that is adaptive and tailored to the needs of individual schools.		X		
1.5	The district promotes a data-driven culture by providing strategies connected to best practices that all staff members and school communities are expected to be held accountable for implementing.				X

Tenet 2 - School Leader Practices and Decisions: Visionary leaders create a school community and culture that lead to success, well-being and high academic outcomes for all students via systems of continuous and sustainable school improvement.

#	Statement of Practice	H	E	D	I
2.1	The district works collaboratively with the school to provide opportunities and supports for the school leader to create, develop and nurture a school environment that is responsive to the needs of the entire school community.		X		

Tenet 3 - Curriculum Development and Support: The school has rigorous and coherent curricula and assessments that are appropriately aligned to the Common Core Learning Standards (CCLS) for all students and are modified for identified subgroups in order to maximize teacher instructional practices and student-learning outcomes.

#	Statement of Practice	H	E	D	I
3.1	The district works collaboratively with the school(s) to ensure CCLS curriculum that provide 21st Century and College and Career Readiness skills in all content areas and provides fiscal and human resources for implementation.			X	

Tenet 4 - Teacher Practices and Decisions: Teachers engage in strategic practices and decision-making in order to address the gap between what students know and need to learn, so that all students and pertinent subgroups experience consistent high levels of engagement, thinking, and achievement.

#	Statement of Practice	H	E	D	I
4.1	The district works collaboratively with the school to provide opportunities and supports for teachers to develop strategies and practices and addresses effective planning and account for student data, needs, goals, and levels of engagement.		X		

Tenet 5 - Student Social and Emotional Developmental Health: The school community identifies, promotes, and supports social and emotional development by designing systems and experiences that lead to healthy relationships and a safe, respectful environment that is conducive to learning for all constituents.					
#	Statement of Practice	H	E	D	I
5.1	The district creates policy and works collaboratively with the school to provide opportunities and resources that positively support students' social and emotional developmental health.			X	
Tenet 6 - Family and Community Engagement: The school creates a culture of partnership where families, community members, and school staff work together to share in the responsibility for student academic progress and social-emotional growth and well-being.					
#	Statement of Practice	H	E	D	I
6.1	The district has a comprehensive family and community engagement strategic plan that states the expectations around creating and sustaining a welcoming environment for families, reciprocal communication, and establishing partnerships with community organizations and families.		X		

District Review Narrative:

Tenet 1.1: The district has a comprehensive approach for recruiting, evaluating and sustaining high-quality personnel that affords schools the ability to ensure success by addressing the needs of their community.	**Tenet Rating**	**H**

Debriefing Statement: The district has successful systems in place that include the use of external partnerships, school leader support, and strategies focused on recruiting, evaluating, and sustaining personnel. When there is an infrequent vacancy, the district hires high-quality instructors to address student needs.

Strengths:

- The district has a comprehensive system for recruiting highly qualified staff in collaboration with colleges and preparatory institutions. This system was developed over the last three years and represents a significant improvement over previous procedures. The district has experienced more than 60 staff reductions in the past four years. A review of documents and interviews with district leaders demonstrated that all current district staff is 100 percent highly qualified, as defined by New York State Commissioner Regulations (NYSCR), and staff retention rates are very high, as vacancies rarely occur in the district. When they do, the district uses a set of procedures and protocols to seek internal candidates first, as well as to fulfill the district's legal obligation for the Preferred Eligibility List (PEL). According to district leaders, and a review of documents, when internal candidates are not selected, the district implements their external procedures and protocols to select a candidate via shared a decision-making committee. The established vision for recruitment and training is reflected in a quote from the cabinet interview when a leader stated, "We have a high standard for community involvement from our staff. We teach all new staff that we are a service industry, and that we take that very seriously for those that work here." The district collaborates with several area teacher and leader preparation programs, such as SUNY, Houghton College, Jamestown Community College, St. Bonaventure, and the Cattaraugus Allegany BOCES. The district has fully implemented a comprehensive Annual Professional Performance Review (APPR) model, consistent with NYS regulations, that provides for evidence presentation, review, and feedback. Using the New York State United Teachers (NYSUT) rubric and protocols, district leaders shared regular research-based feedback that is provided to administrative and instructional staff, which included topics such as data-based decision making, evidence-based dialogue, and pedagogical best practices, which result in improved professional reflection and planning. Through document review, the review team found that written teacher evaluations include evidence for at least 16 rubric indicators, reflections on practice, and administrative feedback for classroom visits. In the collectively bargained APPR cycle, district leaders reported that the District Administrative Council (DAC) surveys staff and considers APPR ratings in order to develop professional development (PD) to meet the needs of staff, which includes data-driven instruction, Professional Learning Communities (PLC's), and the Common Core Learning Standards (CCLS). The APPR process provides information about professional learning, and informs data-driven decision-making for school improvement ensuring that district-wide staff has current preparation to meet the evolving needs of students. The district has successfully implemented research-based staff retention strategies, such as positive collective bargaining experiences and agreements, strong internal communication processes, relevant PD, and a robust mentoring program. The self-assessment document also noted credit for graduate work, and for membership in professional organizations, as additional incentives for staff retention. Due to the systems and leadership provided in the district, this community maintains

high quality veteran teachers for their students.

Areas for Improvement:

All ratings for this Tenet are either **Highly Effective** or **Effective** and therefore, comments are listed under **Strengths**.

Tenet 1.2.: The district leadership has a comprehensive and explicit theory of action about school culture that communicates high expectations for addressing the needs of all constituents.	**Tenet Rating**	**D**

Debriefing Statement: District leaders have unwritten expectations that are communicated verbally, but are not explicit. Therefore, the district's expectations do not meet the needs of all constituents, and this limits student success.

Strengths:

All ratings for this Tenet are either **Developing** or **Ineffective** and therefore, comments are listed under **Areas for Improvement**.

Areas for Improvement:

- District leaders have high expectations that are not widely communicated. As a result, staff does not consistently align their professional practices to these expectations. The vision and mission of the district is listed on its website and in posters provided for the schools that read, "The Olean City School District is a student-centered community of excellence in which all members are challenged to learn, achieve, contribute, and innovate." However, staff reported that few understand how this vision impacts the activities of the district or their professional practice. Interviews and a document review demonstrated that the district expectations are developed and communicated via the Comprehensive District Education Plan (CDEP) development process, as well as the APPR, and other comprehensive planning efforts in the district, such as the Focus District committee, the Professional Development Plan, the Technology Plan, and Academic Intervention Services (AIS). However, these plans are not widely read, or understood, by staff. District leaders reported that high expectations are communicated regularly through administrative team meetings and district-wide school faculty meetings, as well as emerging procedures in Data Driven Instruction (DDI) protocols. However, specific performance targets, such as SMART goals, were not evident. District staff reported that the district achieves public transparency through public board meeting minutes, telephone messaging services, the city newspaper, and the district website. However, district leaders reported that an explicit theory of action for school improvement and student outcomes is not articulated, nor is targeted communication provided to staff and the community. The lack of a clear and well-communicated explicit theory of action for targeted school improvement hinders student success.

Tenet 1.3: The district is organized and allocates resources (financial, staff support, materials, etc.) in a way that aligns appropriate levels of support for schools based on the needs of the school community	**Tenet Rating**	**D**

Debriefing Statement: The district has a collaborative structure in place for providing support and resources to school leaders to address the needs of school communities. However, the resource allocations do not adequately consider the needs of all students, staff, and families, which delays school improvement and success for all constituents.

Strengths:

All ratings for this Tenet are either **Developing** or **Ineffective** and therefore, comments are listed under **Areas for Improvement**.

Areas for Improvement:

- The district has strong financial leadership and expertise, as well as multiple structures in place to collaboratively determine and review areas of need in the district on a regular basis, including the finance and operations committees of the Board of Education, the Budget Advisory Committee, and the Director and Administrative Council meetings. However, the decision-making process is not guided by a multi-year strategic plan for targeted student outcomes. Wide-spread community support for the district's financial plans were reported by district, school, and community members, and is evident through the participation in the Board of Education, the annual community approval of the district budget, and the successful closure of school buildings. However, the review team found that the community was not able to articulate the district's comprehensive school improvement targets when asked to identify financial priorities. A review of documents, and interviews with district and school leaders, demonstrated that a decentralized school-based budgeting and planning model is in place. However, a comprehensive data-driven system for monitoring the efficiency and effectiveness of school budgets to ensure that they meet the needs of the students does not exist. The district reported that they fairly distribute resources, technology, and qualified personnel to each building. However, schools reported that the district prioritizes the allocation of resources based on a yearly analysis, and negotiations that focuses on complying with mandates and on balancing competing interests within the district on programs, such as pre-k, arts, technology, sports, and transportation. Programs and mandates are discussed in planning meetings, but ultimately district leaders reported that they balance the financial needs with community interests and the CDEP process. Although there is a collaborative budgeting and resource allocation process in place, the lack of a multi-year comprehensive financial strategic plan focused on student achievement outcomes, limits student success.

Tenet 1.4: The district has a comprehensive plan to create, deliver and monitor professional development in all pertinent areas that is adaptive and tailored to the needs of individual schools.	**Tenet Rating**	**E**

Debriefing Statement: The district offers PD that generally meets school staff requests and needs. A PD calendar is established, and mechanisms are in place for providing follow-up support. However, the district does not use student achievement data to provide targeted PD to improve instruction.

Strengths:

- As a part of the CDEP process, the district developed a collaborative Professional Development Plan (PDP) based on mandates, goals, and staff survey results, but the district does not monitor or review the plan for its effectiveness in improving student outcomes. The district provides regional and local PD days, and staff release time, that are allotted via collective bargaining agreements and the district calendar. Through participation in school and district level committees, staff surveys, and dialogue with school leaders, staff can express their interests and needs for professional learning. BOCES initiated programs, CCLS topics, technology, curriculum development, and other assorted topics are provided based on current staff needs, which are then communicated through newsletters, email, PD day schedules, and school committees in the form of a PD calendar and a tracking system, PD Premier. The district self-assessment indicated that follow-up support is

provided as needed by district, school, BOCES staff specialists, and consultants during the district allocated congruence time, faculty meetings, data meetings, and team planning meetings. Teacher Improvement Plans and an extended mentoring program are also formal aspects of the APPR process that supports professional learning. Overall, a collaborative and targeted program for professional learning is provided for staff, increasing their awareness of relevant topics, but the district recognizes that making better use of achievement data to drive instruction is a focus area that needs additional PD attention.

Tenet 1.5: The district promotes a data-driven culture by providing strategies connected to best practices that all staff members and school communities are expected to be held accountable for implementing.	**Tenet Rating**	**I**

Debriefing Statement: Although the district informally communicates expectations regarding the use of data, staff practices do not demonstrate an explicit system of data-driven decision-making. Therefore, few stakeholders understand the current performance of students, which results in teachers using ineffective strategies to address the needs of students in identified subgroups

Strengths:

All ratings for this Tenet are either **Developing** or **Ineffective** and therefore, comments are listed under **Areas for Improvement**.

Areas for Improvement:

- The district does not promote a data-driven culture by providing strategies connected to best practices that all staff and school communities are expected to be held accountable for implementing. The district has begun to encourage school staff to look at interim formative assessments on a quarterly basis through the implementation of the STAR Reading Enterprise and STAR Math Enterprise. In addition, PD on data-driven instruction is beginning to help staff better understand student needs. However, due to the lack of dedicated resources for data leadership, interviews with district leaders and a document review demonstrated that the district has not established, or communicated, a vision for data-driven protocols and procedures to systematically identify, support, instruct, and assess student needs. Although district and school leaders review some data, such as Reading First and Title I data at the primary level, a comprehensive set of data is not collected, analyzed, and understood by teacher teams, committees, and leaders. District leaders have provided feedback related to the use of data to school leaders, and provided PD to the Administrative Council. However, curriculum, instruction, and assessments at the district and school levels do not fully align to student needs, and this hinders student academic success.

This section provides a narrative that communicates how school communities perceive the support provided by the district.

Tenet 2.1 - School Leader Practices and Decisions: The district works collaboratively with the school to provide opportunities and supports for the school leader to create, develop and nurture a school environment that is responsive to the needs of the entire school community.	**Tenet Rating**	**E**

Strengths:

- Interviews with district and school staff, and a document review demonstrated the positive and collaborative relationship between school leadership and the district. Leaders participate in collaborative opportunities via CDEP, Administrative Council, Principals Meetings, and assorted ad-

hoc committees. School leaders reported an open door policy on behalf of the district administrative offices. The Building Leadership Team agendas demonstrated that they attend to district expectations, and several members of the school staff serve on district committees. Teacher leaders have opportunities to support their peers through PD, release time, special assignments, and coaching roles. The district supports the school leaders in meeting the instructional needs of students and staff. By giving autonomy and oversight of the school budget, resources, calendar, and facilities, the school leaders are empowered to make decisions that affect student outcomes. Although school leaders identified that some school needs are not fully met in areas such as curriculum, instruction, assessment, and intervention, school and district leaders reported that they are planning collaboratively to meet these identified needs, and that this is a shared priority. District interviews demonstrated that district leaders review all teacher team minutes and provide feedback to school leaders related to the content and recommendations for improving data-driven principles, pedagogy, and student social emotional health. As school leaders identify the needs of its stakeholders, the district is generally responsive in meeting most support requests. The review team found that the district supports the schools in many ways, such as through a new literacy lab for grades four and five, a new fully equipped computer lab, summer curriculum mapping opportunities, and the inaugural Unified Athletics program for the integration of students with disabilities and general education students. Overall, a supportive relationship between the district and schools enables schools to design and implement a program that meets the needs of most students.

Tenet 3.1 - Curriculum Development and Support: The district works collaboratively with the school to provide opportunities and supports that are connected to the implementation of a comprehensive curriculum appropriately aligned to the Common Core Learning Standards (CCLS) and are inclusive of the arts, technology and other enrichment subjects in a data-driven culture.	**Tenet Rating**	**D**

Strengths:

All ratings for this Tenet are either **Developing** or **Ineffective** and therefore, comments are listed under **Areas for Improvement**.

Areas for Improvement:

- The district provides annual opportunities for curriculum development, but a CCLS aligned P-12 curriculum is not in place. While the district provides resources for curriculum in the form of textbooks, information about New York State modules, specialist staff, and professional learning opportunities that include participation in regional Network Training Institutes and Engage NY, the district does not have fully CCLS-aligned curricular materials in place. Due to substantive budgetary reductions in recent years, opportunities for the rich integration of the arts, as well as enrichment opportunities, have been dramatically reduced. According to school and district staff, as well as a document review, the district has organized and supported curriculum-mapping efforts during the summer, PD days, and embedded school meetings. Facilitative support has been provided in the form of district, school, and BOCES specialists to inform the alignment of maps with the CCLS and NYS Learning Standards, but no maps demonstrated a P-12 vertical alignment with the CCLS. The

district has secured a 60 percent full-time equivalent staff position, via CA BOCES, to support curriculum coordination and development across the district. In the absence of adequate dedicated resources for curriculum leadership at the district level, district leaders have provided a universal directive to all staff to complete CCLS curriculum maps by June 2014. However, a formal system for monitoring curriculum alignment and curricular effectiveness is not in place, so teachers are not equipped with curricula for providing students with maximum opportunities to meet the CCLS expectations.

Tenet 4.1 - Teacher Practices and Decisions: The district works collaboratively with the school to provide opportunities and supports for teachers to develop strategies and practices that lead to effective planning and account for student data, needs, goals, and levels of engagement.	**Tenet Rating**	**E**

Strengths:

- The district and schools collaboratively identify the professional development needs of staff, and the district provides professional learning opportunities and follow-up activities designed to support the staff in selecting best practices and appropriate strategies for all students. The district PDP is developed during the CDEP process, where the committee reflects the composition of NYSCR 100.11, and includes teachers and parents. Based on a document review and district leader interviews, the review team found that the district holds data meetings to review and prioritize benchmark data from select assessments with school leaders. Teachers have taken the lead in planning district sponsored PD days, and teacher and school leader attendance is encouraged at professional conferences related to their specific and identified needs. School staff reported that when they ask to go to a conference or PD that the principal approves, the district never denies them the PD. Follow-up support is designed by the school and district to be job-embedded, including team meetings, common planning time, faculty meetings, BOCES instructional and technology specialists, and formal networks via the BOCES Instructional Support Services. Collaborative planning between the district and schools builds the capacity of staff to understand student needs, and to increase teachers' repertoire of effective instructional strategies.

Tenet 5.1 - Student Social and Emotional Developmental Health: The district creates policy and works collaboratively with the school to provide opportunities and resources that positively support students' social and emotional developmental health.	**Tenet Rating**	**D**

Strengths:

All ratings for this Tenet are either **Developing** or **Ineffective** and therefore, comments are listed under **Areas for Improvement**.

Areas for Improvement:

- Although the district leadership reported that there is no policy concerning the social and emotional developmental health of students, district and school staff work collaboratively to plan professional learning for targeted staff in this area, mainly counselors and intervention specialists. Both district and school staff serve on shared committees, such as PDP, Health, Safety, and Technology, in order

to provide a voice and to plan for the needs of all schools. Through community partnerships, the district has hosted PD on topics such as Adolescent Brain and Drug Trends, sponsored participation in a trauma summit, hosted the Dignity for All Students Act, supported anti-bullying communication, and financially supported the implementation of assorted character education programs across the district including "virtues" and "Positive Action" at OIMS. The county Office of Probation has an office within the district and supports students and staff in proactive intervention strategies. In conjunction with county law enforcement, the implementation of a "text a tip" hotline has become a well-used tool for the school community to report incidents of bullying and other social emotional related issues. The district self-assessment, and interviews with school staff, demonstrated that the follow-up support for PD is inconsistent and voluntary on the part of targeted staff, but this follow-up has included participation in multiple community-school partnership programs including Directions in Independent Living, Liberty Partnership, the Utica National Safe Schools Program, and Project Alert. Assorted county and agency partnerships that target support for student's unique interests and needs include Bona Buddies, Cutco Tutors, County Drug Quiz Team, Houghton String Festival, McDonald's character trait incentive program, and CARES. District leaders reported that although the DTSDE process has increased awareness for student needs in this area, and the district has the NYSED socio-emotional curriculum, the district has not put into place a vision, expectations, or a system to teach staff to plan for, and meet, the social emotional health needs of students. Therefore, students social and emotional developmental health needs are inconsistently addressed across the district.

Tenet 6.1 - Family and Community Engagement: The district has a comprehensive family and community engagement strategic plan that states the expectations around creating and sustaining a welcoming environment for families, reciprocal communication, and establishing partnerships with community organizations and families.	**Tenet Rating**	**E**

Strengths:

- Interviews with district leaders, school leaders, staff, and parents demonstrated that there is a strong community connection and support for the district and its schools. The district leaders reported that they have almost completed a needs assessment as a basis for developing a comprehensive plan for community and family engagement, and have conducted the family engagement survey required in the DTSDE process. Four school leaders recently attended PD to gain understanding in best practices in family engagement, and have shared these with the district-wide leadership team. The review team found that several policies, systems, and procedures are in place to help promote and create a welcoming and safe environment for families, such as school volunteers, sign in/out procedures, participation in district and school planning committees, Title I parent involvement, school website and social media outlets, and the eSchool parent portal. During a recent reconfiguration of grade levels, which resulted in building closures, a transition committee provided opportunities for engagement and partnership by all district and school stakeholders. Although parents expressed continued struggles with aspects of the closure and staff reductions, the structures and strategies used by this transition committee have generated increased family participation in school events, such as concerts and information nights. While the district reported that the website could be translated into 11 different languages, the review team found no evidence of this, as data indicates that there are no non-English population groups in the school community. The family partnerships fostered across the district have resulted in increased opportunities to meet student needs.

Synthesis of Recommendations across All Schools Reviewed in the District:

DISTRICT LEVEL RECOMMENDATIONS:

In order for the District's strategy and practices to align with the concepts in the Effective column of Tenet 1 the District should:

Tenet 1: District Leadership and Capacity

- 1.2: Collaboratively develop and articulate an explicit theory of action with the support of all relevant stakeholders. The plan for communicating and implementing this theory of action should be included and regularly monitored for effectiveness.
- 1.3: The district, in collaboration with the schools, should develop and monitor a multi-year comprehensive strategic financial plan that targets school improvement and student performance needs, including practices that are demonstrated by research to improve student outcomes.
- 1.5: Develop a comprehensive system for using data to make strategic programmatic, financial, curricular, instructional, and environmental decisions for improving student outcomes. Develop and implement procedures, protocols, and communication strategies for implementing this system. Professional learning and measures of effectiveness should be included in the plan.

Tenet 3: Curriculum Development and Support

- 3.1: The district should identify, support, and implement dedicated resources for leadership focused on the immediate development of rigorous curriculum aligned with the CCLS in mathematics, English language arts, and literacy. The district should develop a comprehensive curricular framework, unit design, and lesson plan outline across the district, as well as a system to monitor the effectiveness of this framework.

Tenet 5: Student Social and Emotional Developmental Health

- 5.1: The district should prioritize the development of a policy, and comprehensive model, to teach and empower staff to understand, address, and meet the social and emotional development health needs of all students. This model should also include structures to monitor the implementation and effectiveness of the policy.