# ILLINOIS STATE BOARD OF EDUCATION

## NONPUBLIC SCHOOL EVALUATION INSTRUMENT GLOSSARY

To Accompany 91-04A Nonpublic School Evaluation Instrument

## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Comments</td>
<td>3</td>
</tr>
<tr>
<td>Contacts in Case of Questions</td>
<td>4</td>
</tr>
<tr>
<td>Evaluation instrument Sections</td>
<td>5</td>
</tr>
<tr>
<td>Preliminary Area</td>
<td>5</td>
</tr>
<tr>
<td>Section I — Administrative</td>
<td>7</td>
</tr>
<tr>
<td>A. General Policies</td>
<td>7</td>
</tr>
<tr>
<td>B. Student Privacy</td>
<td>7</td>
</tr>
<tr>
<td>C. Bullying Policy</td>
<td>7</td>
</tr>
<tr>
<td>D. Attendance</td>
<td>8</td>
</tr>
<tr>
<td>E. Anti-discrimination Policies</td>
<td>9</td>
</tr>
<tr>
<td>F. Student Protection</td>
<td>10</td>
</tr>
<tr>
<td>G. Violence against School Personnel</td>
<td>10</td>
</tr>
<tr>
<td>H. Drug and Weapons Incidents</td>
<td>11</td>
</tr>
<tr>
<td>I. General Compliance</td>
<td>11</td>
</tr>
<tr>
<td>Section II — Educational Program</td>
<td>12</td>
</tr>
<tr>
<td>A. General Instruction</td>
<td>12</td>
</tr>
<tr>
<td>B. Patriotism</td>
<td>12</td>
</tr>
<tr>
<td>C. Health Topics</td>
<td>12</td>
</tr>
<tr>
<td>Section III — Personnel</td>
<td>14</td>
</tr>
<tr>
<td>A. Background Checks</td>
<td>14</td>
</tr>
<tr>
<td>B. Communicable Diseases</td>
<td>14</td>
</tr>
<tr>
<td>C. Instructional Staff Evaluations</td>
<td>15</td>
</tr>
<tr>
<td>D. Student Support Services</td>
<td>15</td>
</tr>
<tr>
<td>E. Degrees</td>
<td>16</td>
</tr>
<tr>
<td>F. Licensure</td>
<td>16</td>
</tr>
<tr>
<td>Section IV — Health and Safety</td>
<td>17</td>
</tr>
<tr>
<td>A. Building and Grounds</td>
<td>17</td>
</tr>
<tr>
<td>B. Asbestos Plan</td>
<td>17</td>
</tr>
<tr>
<td>C. School Lunch and Nutrition</td>
<td>18</td>
</tr>
</tbody>
</table>
General Comments

- This Glossary is intended to be a living document, always subject to updating and revisions. Consequently, users might be best advised not to copy it to their own computers but to go to the website for each use in order to be assured of seeing the latest contents.

In that same spirit, users of the Glossary should contact the Illinois State Board of Education (ISBE)—see information at the end of this section—if there appears to be a need for comment or discussion beyond what is currently here for a given item.

- There needs to be evidence for each item in the evaluation instrument (a.k.a., the “probe”). The evidence is what was examined, which resulted in a “yes” or “no” response.
  - Evidence might be staff or student files, policy manuals, a walkthrough of the building, an interview with the principal or other staff member, a classroom visit, visual inspection, etc.
  - Sometimes the evidence is obvious—student health records, for example, are going to be in student files—and the team does not have to state the obvious in the evaluation instrument.
  - There doesn’t need to be a lot of detail, but another person should be able to look at the evidence list and find those items if a follow-up visit is needed. Therefore, for example, unexplained abbreviations should be avoided.

- The team must use its professional judgment to determine when to view all personnel or all student files and when to do just a sampling.
  - Normally, one would expect this decision to be true throughout the visit, but it is possible a team might choose, for example, to do a sampling of student records for one issue but to look at all student records for another. Therefore, please mark each as to whether all records or just samples were inspected.
  - When doing a sampling of student records, try to have the sample touch on both boys and girls in each grade and to have the sample touch on all grade levels.

- Everything is assumed to apply to all schools, so in general, anything marked “N/A” needs an explanation.

- If it is unclear from the probe what an item is about or needs in the way of evidence, please consult the appropriate section in this Glossary first. If questions remain, contact one of the sources list at the end of this section.

- If an item refers to an action (a safety drill held, a document collected, a report made, etc.), then it is not enough that the school has a policy regarding the action. Having a policy is not the same as following a policy, so the team must confirm that the action, in fact, was taken.

- In general, “no” answers in the evaluation instrument MUST result in one or more items being listed in the Deficiencies section at the end of the evaluation instrument; however, there are a few cases, such as the meal program issues in Section IV, item C, where a “no” answer may be simply information and would not constitute a deficiency.

- At the conclusion of the visit, the team should
  - Offer the school about 30 days in which to “fix” things. It would be unusual for schools not to have at least one deficiency in the evaluation instrument, but it would also be typical for schools to have deficiencies that are easy for them to fix. This window gives the schools an opportunity to fix those easy items and complete a report that might not have any deficiencies indicated.
  - Deliver a copy of the draft report of the evaluation instrument to the school for its reference. This must be done within two weeks of the visit. The 30-day window starts when the evaluation instrument has been sent. One easy way to do this is to give the school an electronic copy of the report at the close of the visit.
At the end of those 30 days, change the evaluation instrument to reflect any fixes the school has made. This becomes the final report of the team.

Email the resulting final evaluation instrument text as a PDF to the ISC 2 contact. Do not print and scan the evaluation instrument as the next steps require that the typing areas of the document remain working.

It would be very rare for the evaluation instrument to be accompanied by any additional documentation, but if the team feels something else should be included, it should do so.

Contacts in Case of Questions

Illinois State Board of Education (ISBE)  Intermediate Service Center 2 (West 40)
Regulatory Support & Wellness Division  Richard Erdman
(217) 782-5270  (708) 449-4284
Evaluation instrument Sections

Preliminary Area

- The team must complete all of the information areas except the area at the bottom of the page marked “ISBE Use Only.”
  - Start with the school year in the header area.
  - Include the school’s RCDT code (the region or county name is NOT sufficient).
    - If school officials do not know their RCDT code, this is a teaching moment since it is important that they know their number and use it on forms and in communications. One way to find the number is to go to [www.isbe.net/Pages/Data-Analysis-Directories.aspx](http://www.isbe.net/Pages/Data-Analysis-Directories.aspx) and click on “Directory of Educational Entities”; choose the “Non Pub Sch” tab and find the school in the list. (Hint — Control F will pull up a search function.) The RCDT code is a combination of the numbers in columns C and D.
    - “Other” will be rarely checked under type of visit, but if it is, an explanation is needed on the blank line provided.
    - Some schools will not have fax numbers.
    - The principal’s cell phone number is not required.

- Here is a table showing the options for school affiliation. The numbers refer to the last two digits of the school's RCDT code. Some numbers are not currently used.

<table>
<thead>
<tr>
<th>CODE</th>
<th>AFFILIATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Independent — Regular (Not religious affiliated) (Not parent operated)</td>
</tr>
<tr>
<td>02</td>
<td>Baptist</td>
</tr>
<tr>
<td>03</td>
<td>Christian Schools International (of Michigan)</td>
</tr>
<tr>
<td>05</td>
<td>Jewish</td>
</tr>
<tr>
<td>06</td>
<td>Lutheran</td>
</tr>
<tr>
<td>07</td>
<td>Methodist</td>
</tr>
<tr>
<td>08</td>
<td>Presbyterian</td>
</tr>
<tr>
<td>09</td>
<td>Protestant Episcopal</td>
</tr>
<tr>
<td>10</td>
<td>Roman Catholic</td>
</tr>
<tr>
<td>11</td>
<td>Seventh-Day Adventist</td>
</tr>
<tr>
<td>14</td>
<td>Other Religious Affiliation</td>
</tr>
<tr>
<td>16</td>
<td>Montessori School</td>
</tr>
<tr>
<td>17</td>
<td>Greek Orthodox</td>
</tr>
<tr>
<td>19</td>
<td>Independent — Special Education (Not religious-affiliated) (Not parent-operated)</td>
</tr>
<tr>
<td>20</td>
<td>Illinois Association of Christian Schools</td>
</tr>
<tr>
<td>21</td>
<td>Amish</td>
</tr>
<tr>
<td>22</td>
<td>Mennonite</td>
</tr>
<tr>
<td>23</td>
<td>Islamic/Muslim</td>
</tr>
<tr>
<td>25</td>
<td>Pentecostal</td>
</tr>
<tr>
<td>26</td>
<td>Association of Christian Schools International (of Colorado)</td>
</tr>
<tr>
<td>27</td>
<td>Christian Schools of Illinois</td>
</tr>
</tbody>
</table>

- The grade level question is not the grades served by the school but the grades for which recognition is being sought. For example, a school might serve grades K-12 but is only seeking recognition for the high school grades.

- For the team:
  - Indicate by placement whether the person represents the public world, the nonpublic world, or a Regional Office of Education/Intermediate Service Center.
  - Persons who are present but not part of the team should not be listed. This area is to record the team and not the visit attendance.
The public person must “represent” a public educational entity — that is, the person must be currently employed by such an entity though not necessarily full time.

- The rule does not specify what role the public person must have in his/her position — teacher, principal, superintendent, business manager, Title I director, etc. are all fine.
- The rule is interpreted to allow persons who teach education courses at a public college or university also to serve on the team.

The nonpublic person must “represent” a nonpublic educational entity OR be familiar with the nonpublic world, so a retired nonpublic person or a nonpublic person who has taken a job outside of nonpublic schools may serve.

- The rule does not specify what role the nonpublic person must have in his/her position — teacher, principal, superintendent, business manager, etc. are all fine.
- The rule is interpreted to allow persons who teach education courses at a nonpublic college or university also to serve on the team.
- NOTE: A person with a vested interest in the school becoming or remaining recognized should not serve on the team. For example, an employee of a Catholic diocesan office would have a conflict of interest as a member of a team visiting a diocesan school because the school is connected to the diocese administratively, financially, and legally, and thus diocesan employees have an interest in a school that is intimately connected to the diocese being fully recognized.

- Do not make any marks in the “ISBE Use Only” section.
Section I — Administrative

A. General Policies

- “Written” includes electronic documents.
- Item 1 is likely to be in the form of bylaws for the corporation that is the school or that operates the school.
- Item 2 is likely to be in some sort of policy manual.
- Item 3 may be accomplished by a handbook distributed to parents, material posted on the school’s website, and/or other means.
- Catholic schools generally use policy collections created by their diocesan offices, which is fine.
  - However, each school needs a statement that it adopts those diocesan policies wholly — that is, the school needs to take on the diocesan policies as its own in some official, formal way.
  - Sample statement language includes (but is not limited to) these options:
    - “St. Polycarp School accepts as part of its own school policies all school-related policies of the Diocese of Rantoul.”
    - “St. Polycarp School accepts as part of its own school policies the Catholic School Manual published by the Diocese of Rantoul.”
    - “St. Polycarp School is a part of the Diocese of Rantoul and thus all diocesan policy statements and documents are automatically school policies.”
    - “St. Polycarp School adopts in whole all policies set forth in the Educational Policy Manual for School Administrators published by the Diocese of Rantoul’s Office of Catholic Schools. Additional local school policies may be developed but cannot be contrary to those policies set forth by the Diocese of Rantoul.”
  - It could be that other schools are subject to similar policy collections created by an umbrella organization, and those schools would need similar adoption language.
  - If a school has a policy needed for compliance that is only in a diocesan or similar document, that policy may be effectively hidden from parents, students, or staff that need to know about it. A recommendation should be made to copy the policy into a more user-friendly document such as a parent handbook.

B. Student Privacy

- Students have privacy rights relative to social media, and this statute requires the school to notify students of those rights.
- Those rights may be overridden if the school has evidence to suggest that the student may have access to evidence within a social media account. The student can be required to disclose access under those circumstances.

C. Bullying Policy

- The requirement to have a bullying policy only applies to nonpublic elementary or secondary schools that are nonsectarian, so only RCDT codes ending in -01 or -19 must have these policies. Mark this N/A for other schools.
- Schools having a bullying policy although not required to do so may receive a commendation for this at the end of the evaluation instrument.
- For schools for whom this requirement applies, note that the school must both have a compliant policy and have submitted that policy or its biennial updates to ISBE as an attachment to an email sent to nonpublic@isbe.net.
- Bullying is prohibited on the basis of actual or perceived race, color, religion, sex, national origin, ancestry, age, marital status, physical or mental disability, military status, sexual orientation, gender-related identity or expression, unfavorable discharge from military service, association with a person or group with one or more of the aforementioned actual or perceived characteristics, or any other distinguishing characteristic.
- Students shall not be subjected to bullying:
  - During any school-sponsored education program or activity;
While in school, on school property, on school buses or other school vehicles, at designated school bus stops waiting for the school bus, or at school-sponsored or school-sanctioned events or activities;

Through the transmission of information from a school computer, a school computer network, or other similar electronic school equipment; or

Through the transmission of information from a computer that is accessed at a non-school-related location, activity, function, or program or from the use of technology or an electronic device that is not owned, leased, or used by a school district or school if the bullying causes a substantial disruption to the educational process or orderly operation of a school. This item applies only in cases in which a school administrator or teacher receives a report that bullying through this means has occurred and does not require a district or school to staff or monitor any non-school-related activity, function, or program.

Bullying includes "cyber-bullying" and means any severe or pervasive physical or verbal act or conduct, including communications made in writing or electronically, directed toward a student or students that has or can be reasonably predicted to have the effect of one or more of the following:

- Placing the student or students in reasonable fear of harm to the student's or students' person or property;
- Causing a substantially detrimental effect on the student's or students' physical or mental health;
- Substantially interfering with the student's or students' academic performance; or
- Substantially interfering with the student's or students' ability to participate in or benefit from the services, activities, or privileges provided by a school.

Bullying may take various forms, including without limitation one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying. This list, coming from the statute, is illustrative and non-exhaustive.

"Cyber-bullying" means bullying through the use of technology or any electronic communication, including without limitation any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire; radio; electromagnetic system; photo electronic system; or photo optical system, including without limitation electronic mail, internet communications, instant messages, or facsimile communications. "Cyber-bullying" includes the creation of a webpage or weblog in which the creator assumes the identity of another person or the knowing impersonation of another person as the author of posted content or messages if the creation or impersonation creates any of the effects enumerated in the definition of bullying in this section. "Cyber-bullying" also includes the distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons if the distribution or posting creates any of the effects enumerated in the definition of bullying in this section.

The required policy on bullying, which must be filed with the State Board of Education, shall include a process to investigate whether a reported act of bullying is within the permissible scope of the district's or school's jurisdiction and shall require that the district or school provide the victim with information regarding services that are available within the district and community, such as counseling, support services, and other programs. The policy must be communicated to students and parents/guardians on an annual basis. The policy must be updated every two years and filed with the State Board of Education after being updated.

D. Attendance

- Item 1
  - Requiring “regular” attendance is not the same as requiring “daily” attendance. Stating that daily attendance is important is not the same as requiring it.
  - School policies need to require daily attendance.
  - Correspondence schools (online) are not required to have daily attendance and, therefore, N/A may be marked for such schools.
If this requirement does not appear in the parent handbook, a recommendation should be made that it is so added.

- **Item 2**
  - Schools no longer must meet minimum instructional hours.
  - Schools must still have a school year of at least 176 days, but there is no minimum number of instructional hours for any of those days.
  - Correspondence schools (online) are not required to have specific attendance minimums, and, therefore, N/A may be marked for such schools.

### E. Anti-discrimination Policies

- These policies may be combined into a single statement or may be distributed throughout a school’s policy documents.

**Note that the visit team is looking for policies in place and not the implementation of those policies.** For example, based on the information below, a school might have to have an Americans with Disabilities (ADA) policy (which the team checks for) but has not installed an elevator for disabled students to use (which the team does not check for).

- What follows is some commentary on the statutes cited, but this commentary does not constitute legal advice. When in doubt, schools should contact their own attorneys for legal advice.

- **Item 1a** — Title IX may be N/A under some circumstances. Title IX does not apply to a private school controlled by a religious organization where the application of the law would violate the religious tenets of the organization (34 CFR 106.12). Nonreligious schools are also exempt if the schools do not receive federal financial assistance (34 CFR 106.11).

- **Item 1b** — A nonpublic school that does not receive any federal funding is not bound by the Individuals with Disabilities Education Act (IDEA) requirements; this item would then be N/A.
  - If the school does receive federal funds or is an otherwise exempt school voluntarily taking on the requirements of IDEA, then the school must admit students with disabilities and serve their needs as well as include IDEA in its policy statements. If the school does not take on IDEA, then this item will be N/A.
  - Please note that under 34 CFR Part 104, if a school receives "Federal financial assistance from the (U.S.) Department of Education," it may not exclude an otherwise qualified student on the basis of a handicap if the student “can, with minor adjustments, be provided an appropriate education, as defined in 104.33(b)(1).” Moreover, the school receiving those funds must implement a 504 plan for such students under the Rehabilitation Act of 1973 since the plans define what appropriate education will mean for each student.

- **Item 1c** — The Age Discrimination in Employment Act of 1967, as the title of the Act suggests, prohibits discrimination on the basis of age in the hiring or on-going employment of individuals who are 40 years old or older. In order to be under the requirements of this law, the employer, in general, must have at least 20 employees and must be engaged in commerce across state lines. For purposes of Illinois nonpublic schools, this may thus be limited to a relatively few schools that meet the employee threshold number and who serve students from outside Illinois.

- **Item 1d** — Title VI prohibits discrimination by recipients of federal funds on the basis of race and national origin. See [www.justice.gov/crt/types-educational-opportunities-discrimination](http://www.justice.gov/crt/types-educational-opportunities-discrimination).

- **Item 1e** — Title VII makes it unlawful to discriminate against someone on the basis of race, color, national origin, sex, or religion for purposes of employment. See [www.justice.gov/crt/laws-enforced-employment-litigation-section](http://www.justice.gov/crt/laws-enforced-employment-litigation-section).
  - However, Section 702 of the Act indicates that its requirements do not apply to religious entities where individuals must be employed to carry out the religious work of the entity. A religious school, therefore, might argue that all staff have a religious function within the mission of the school and not just individuals that teach religion classes. There is also some case law supporting this exemption (e.g., [Hollis v. Methodist Health Care, Inc.](http://www.justice.gov/crt/types-educational-opportunities-discrimination) and [Pime v. Loyola](http://www.justice.gov/crt/laws-enforced-employment-litigation-section)). It would appear that a school cannot merely raise the issue of religious function but must be able to demonstrate, via job descriptions and/or other
documentation, the connection between the duties of the position and the need for a person in that position to be of a particular faith.

- A similar argument might be raised to establish the bona fide need for an exception to the Act on other grounds — for example, a school could argue that its girls’ PE teacher must be female as a legitimate occupational requirement.
- The role of the compliance team representing ISBE during a school visit in this regard is not to litigate a specific circumstance but to use reasonable judgment; questionable cases should be referred to ISBE staff for resolution.

- **Item 1f** — Private schools are considered to be businesses that serve the public, and thus ADA, Title III, requires nonsectarian schools to make their buildings and programs accessible; sectarian schools are not required to do so. These building changes must include auxiliary aids and services to ensure that students with disabilities are not excluded, denied services, segregated, or treated differently from other students. However, these changes are required only so long as they do not change the fundamental nature of the program or result in significant difficulty or expense. (cf. 28 CFR Part 36)

- **Item 2** — The school needs to have identified in writing who is responsible for ensuring that these policies are followed or by what procedure a discrimination concern can be raised for resolution. In general, this would not probably be the principal since the person most likely to engage in discrimination would be the principal. At some schools, the responsible party will be a member of the Board, but other schools have a staff committee charged with this responsibility. Other options are possible.

- If these items do not appear in the staff and parent handbooks, as is appropriate to the individual topic, a recommendation should be made that it is so added to each or both as applicable.

### F. Student Protection

- **Items 1 and 2** — Mandated Reporter
  - The form supplied by the Illinois Department of Children and Family Services (DCFS) is the form that should be used rather than one created by the school or another entity.
  - For religious schools, there is a separate DCFS mandated reporter form for use by clergy.
  - While participation in mandated reporter training is a good idea, the issue here is having the signed DCFS form and not a certificate of training completion.
  - If this notification does not appear in the faculty handbook, a recommendation should be made that it is so added.

- **Item 4** — Birth certificates
  - The birth certificate must be a government-issued document. Hospital birth certificates or baptismal certificates, for example, are insufficient.
  - It may be that children from another country do not have birth certificates. A government-issued document indicating date and place of birth, such as a passport, will meet this requirement.
  - It is a good thing that a school may have a policy regarding birth certificates, but the existence of a policy does **not** substitute for looking in the files to see that certificates are actually documented therein.
  - Correspondence schools may be N/A for this item.

### G. Violence against School Personnel

- Note that it is a written statement from the victim that triggers administrative action.
- Note that both local and state police must be notified.
- A written policy is not required so long as the chief school administrator is aware of the required actions
  - An administrator interview could be sufficient evidence.
  - If this procedure is not in writing, a recommendation should be made that the school memorize this in writing. The staff and parent handbooks would be logical places to do so.
If this policy does not appear in both the staff and parent handbooks, a recommendation should be made that it is so added to each.

H. Drug and Weapons Incidents
- This should appear as a policy statement or as an item in the administrator’s handbook or job description or in some other similar fashion.
- Schools rarely have these issues and therefore are not likely to have proof of having made such reports.
- This item conflates two previous items, both of which deal with drugs but only one with weapons, in response to two statutes, one of which specifies the local law enforcement agencies and the other which does not — hence, the odd language in this regard.
- Note that both local and state police must be notified.
- A written policy is not required so long as the chief school administrator is aware of the required actions
  - An administrator interview could be sufficient evidence.
  - If this procedure is not in writing, a recommendation should be made that the school memorize this in writing. The parent handbook would be logical place to do so.

I. General Compliance
- This item requires general compliance with the requirements for nonpublic schools whether found in statute, in case law, or in regulation. This is not about compliance specific to one area, such as drugs, discrimination, etc.
- *Plyler v Doe* (a court decision making it illegal for public schools to withhold services to immigrant children lacking legal status) is applicable to nonpublic schools because it is specifically cited in the administrative rules for nonpublic schools.
- A possible policy sentences might read:
  - “The School will be in general compliance with the applicable sections of the Illinois School Code, with relevant case law (including *Plyler v Doe*), and with 23 Illinois Administrative Code Part 425.”
  - “All Diocese of Rantoul schools must be recognized by the Illinois State Board of Education. School communities and their principals must be in general compliance with the applicable sections of the Illinois School Code, with relevant case law (including *Plyler v Doe*), and with 23 Illinois Administrative Code Part 425 to maintain ISBE recognition.”
- If this does not appear in both the staff and parent handbooks, a recommendation should be made that it is so added to each.
Section II — Educational Program

General comment — Note that the issues in all three items in this section deal with subjects/topics and not specific courses.

A. General Instruction
   • Item 1 — There really isn’t a single “test” for this item.
     o One seeks a “flavor” of the school that English is the language of instruction. Are you hearing English coming from the classrooms as you walk the halls? Are the school’s posters, signage, and other student information items in English? Is the student work on display in English? Are the textbooks and library books in English?
     o Naturally there would be an exception here for classes designed to teach a foreign language where at least some of the instruction will be in that new language.
   • Item 2 — This is a broad view of the school’s curriculum.
     o One is looking for social studies, for example, and not a detailed study of the Battle of the Bulge.
     o Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc. Sometimes an interview with a teacher is needed for sufficient understanding of how the school is addressing one or more topics.

B. Patriotism
   • Note that all of this is only required in schools supported or maintained wholly or in part by public funds.
     o Reimbursement programs, such as free and reduced lunch programs that are a benefit for the students for which the school is an agent, would not constitute sustaining or maintaining the school via public funds as the school itself, as an entity, gets no benefit — only the students benefit.
     o This whole item, therefore, will be N/A for most nonpublic schools. Just check the one box indicating this and go on to Part C.
     o Some schools wish the evaluation instrument to indicate they do some or all of the activities listed although those activities are not required. If that is the case, mark items as appropriate and indicate in the comments section that none were required.
     o Schools do the listed activities although not required to do so may receive a commendation for this at the end of the evaluation instrument.
     • One might also find these topics studied in a civics or government class or as a unit within an American history class; however, some topics might be covered in a world history class (looking at democracy in ancient Athens, for example) or even a literature class (looking at Puritan government in The Scarlet Letter, for example).
     • “Australian ballot” is another term for a secret ballot, which is to say, the ballot system used in the United States.
     • Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc. Sometimes an interview with a teacher is needed for sufficient understanding of how the school is addressing one or more topics.

C. Health Topics
   • A general approach to health education is outlined for public schools in 23 Illinois Administrative Code 1.420(n), which may serve as nonregulatory guidance for nonpublic schools in creating their health education curricula:
     o No specific amount of instructional time is required for K-6 although health must be “a part of the formal regular instructional program at each grade level."
     o A semester of study (or the equivalent if the topics are spread over different courses or blocks of time) in grades 7-12.
   • All the indicated subjects are required.
o If one of the listed topics is not included at some point in a school's curriculum, the answer for this item is “no.” This then becomes a compliance issue.

o The school has significant flexibility for this item.
  ✓ All topics are required but not in all grade levels; the school can decide which topics to cover at which grade levels.
  ✓ By deciding the grade level for a topic, the school automatically also decides the level of detail or rigor with which the topic will be addressed. The school may exercise good instructional judgment in tackling these topics in an age-appropriate manner.
  ✓ Also, these are “topics” and not “courses” that are required, so a school may elect to cover some items in a health class, some in a science class, some in religion, etc.
  ✓ One topic is required only in the upper grades, so an N/A checkbox is provided for that one item if the visit is to a school with only lower grades. That is, all of the topics are required of all schools except for “instruction in grades 6 through 12 on the prevention, transmission, and spread of AIDS,” which is specifically limited to schools having some or all of grades 6 through 12.
  ✓ Getting all the topics covered thus becomes more challenging in schools only offering a few grades, especially if those grades are at the primary level (K-2). But even in those schools, all of these topics must be addressed.

o For instruction regarding the Abandoned Newborn Infant Protection Act, schools may find some resources through the following:
  ✓ http://saveabandonedbabies.org/for-educators/
  ✓ http://saveabandonedbabies.org/download/2017-SafeHavenCurriculum.docx.pdf

- Documentation could be found in curriculum guides, lesson plans, textbook choices, report cards, marketing materials, parent handbooks, etc. Sometimes an interview with a teacher is needed for sufficient understanding of how the school is addressing one or more topics.
Section III — Personnel

A. Background Checks
   • Item 1 requires a check of personnel files.
     o This check is about school staff and not just the teaching faculty, so it includes janitors, secretaries, etc. And it is for all employees—part-time and full-time.
     o Item 1 requires a fingerprint-based check, which is often not done by commercial entities a school may use. Checks that are not fingerprint-based are not compliant.
     o This check must be done in the database of the Illinois State Police and in the database of the FBI. Commercial background check entities a school may use might not include one or both of these databases, in which case the check has to be done again in a way compliant with the statute (105 ILCS 5/2-3.25o).
     o If Item 1 is “no,” then items 2 and 5 are automatically also “no.” However, if Item 1 is “yes,” items 2 and 5 are not necessarily also “yes.”
     o The Illinois State Police maintain a “Murderer and Violent Offender Against Youth Database” at https://www.isp.state.il.us/cmvo/. Note that checking this database is supplemental to, but not a replacement for, meeting the fingerprint-based criminal background check requirement.
   • Item 3 requires a check of personnel files.
     o This check is about school staff and not just the teaching faculty, so it includes janitors, secretaries, etc. And it is for all employees—part-time and full-time.
     o Item 3 requires some form of evidence that the Statewide Sex Offender Database (maintained by the Illinois State Police at https://www.isp.state.il.us/sor/) has been checked. A printout from that database for each staff member is likely to be the most common documentation.
     o If Item 3 is “no,” then item 4 is automatically also “no.” However, if Item 3 is “yes,” item 4 is not necessarily also “yes.”
   • Some schools also have a connection to the DCFS because the school is also a day care center under DCFS. DCFS requires day care centers to have staff checked through DCFS’ Child Abuse and Neglect Tracking System (CANTS). A check in CANTS by itself is insufficient for ISBE’s purposes because CANTS checks do not necessarily involve a fingerprint-based check of the Illinois State Police FBI databases nor a check of the Statewide Sex Offender Database (maintained by the Illinois State Police).
   • The Roman Catholic dioceses in Illinois generally retain personnel records, so those schools will need some sort of documentation issued by the dioceses for filing at the school level indicating clearly that the checks were done and that the individual was “OK.”
   • Although not required, schools may want to perform due diligence in having similar checks done for parent volunteers and others who are also regularly in the school building and thus are in close proximity to students.
   • Also for due diligence reasons, a school may want to perform similar checks for persons hired prior to the date listed.

B. Communicable Diseases
   • This item is about school staff and not just the teaching faculty, so it includes janitors, secretaries, etc.
   • The files for all new staff must be checked — no sampling allowed here. “New” refers to staff who began working at the school in the school year in which the compliance is being conducted. For example, a person hired in March 2015 to begin working in September 2015 is “new” for the 2015-16 school year and not for the 2014-15 school year.
   • Item 1
     o New staff need a physician’s statement that the individual is physically fit to perform the duties of the position for which the person is being hired.
     o The nature of this statement is not specified in statute, so it could be as simple as a brief note or as involved as a report on a complete physical.
• The key phrase that must be seen in the evidence is “physically fit to perform the duties of the position” or language conveying the same meaning, such as being healthy and able to work is not the same thing.

- Item 2
  o The nature of the required evidence regarding freedom from communicable diseases is not specified in statute, so it could be as simple as a brief note or as involved as a report on a complete physical.
  o The key phrase that must be seen in the evidence is “free from communicable disease” or language conveying the same meaning. Language about being healthy and able to work is not the same thing.
  o “Communicable diseases” for purposes of this question is defined by the Department of Public Health. The health professional supplying the evidence should know what ailments fall under this heading.
  o This evidence shall be created by:
    ✓ A physician licensed in Illinois or any other state to practice medicine in all its branches,
    ✓ An advanced practice nurse who has a written collaborative agreement with a collaborating physician that authorizes the nurse to perform health examinations, OR
    ✓ A physician assistant who has been delegated the authority to perform health examinations by his or her supervising physician.

- Item 3
  o In addition, the new members of the entire staff in school buildings in which preschool children are enrolled in programs need to be tested for TB, not just new staff working specifically with those small children.
  o Therefore, there could be two separate medical documents in these buildings or the information could be combined in a single document.
  o It is also possible that a medical professional might indicate that a TB test is not medically indicated for a staff member and thus waived; again, such a waiver comment might be part of the communicable disease documentation.
  o A school may develop its own form for staff to use when getting any or all of these documentations from a medical professional.

C. Instructional Staff Evaluations
- A “formal” evaluation can be understood to mean an evaluation that is based in a set process or procedure and that results in a written document.
- All staff listed should be evaluated, so one must be sure to check for evaluations of the school’s educational leadership in addition to those for the teaching staff.
- Since the visit is occurring during the school year rather than after the year is completed, it is possible that some yearly evaluations will not have been completed at the time of the visit. If missing evaluations have been scheduled to be done before the year is over, the item should be marked “yes.”
- The evaluation requirement extends to persons described by the school as “teacher aides.” All persons involved in the instructional side of the school’s operation must be evaluated. See “E. Degrees” below.

D. Student Support Services
- This item is concerned with non-academic supports for students: social-emotional health, mental health, adjuncts to learning (e.g., speech therapy, occupational therapy, etc.). Tutoring and other academic services would not be described here.
- These needs may be met through agreements with public school districts, through the pastoral staff of a church-related school having appropriate training or experience, through referrals to community agencies, etc. or through a combination of some or all of these options.
- The school needs a system by which students get connected to needed help. Some schools have a staff committee, and some have a hierarchy leading from student to parent to teacher,
etc. that allows any concerned person to step in at any level with a request or recommendation.

- Students should be allowed to self-refer for help.
- This item generally does not involve documentation, so the usual evidence comes through an interview with the principal.

E. Degrees

- Item 1 — It is a good thing that a school may have a policy regarding only hiring persons with degrees, but the presence of such a policy does not substitute for looking in the files to see that degrees are actually documented therein. We are looking for the evidence of the implementation of such a policy and not the presence of a policy.
- Item 1 — If a person’s file contains a copy of a teaching certificate/license issued by any state, it can be assumed that the person holds a bachelor’s degree.
- Item 1 — If a person’s file contains evidence the person has a master’s degree or higher, it can be assumed that the person holds a bachelor’s degree.
- Item 1 — The degree requirement extends to persons described by the school as “teacher aides” or some similar title if those persons teach. In nonpublic schools, one is either a teacher or one is not; there is no halfway role. If the person does not offer any form of instruction but simply does clerical work (such as entering grades into the gradebook) or personal assistance (such as taking a child to the rest room), then that person is not a teacher. If the person listens to a child read and reports back to the main classroom teacher or corrects the reading mistakes, or the person helps a small group review spelling words, or the person works with a child individually on a math problem, or similar work, then that person is teaching and must have the degree. Job descriptions can be a key element in determining if a person is a “teacher.”
- Item 2 is not about professional development generally. It is about a professional development requirement that applies only to persons hired before 2011-12 who lack a bachelor’s degree; the professional development makes up for the lack of a degree.
- Item 2 refers to professional development that should not happen randomly but should be part of a larger plan. For example, an individual might be taking a series of college courses that lead to a degree or to some sort of certification. Or an individual might be focusing on professional development activities in a particular area of concern or interest, such as improving skills in teaching middle school science.
- Item 2 will be N/A if all of the educators at the school have at least a bachelor’s degree.

F. Licensure

- This item refers ONLY to persons such as school nurses, school psychologists, and food service workers who have professional licensure outside educator license/certification systems. It does not apply to persons involved in the instructional side of the school’s operation.
- This will generally be “N/A” as nonpublic schools cannot normally afford to have such persons on staff.
Section IV — Health and Safety

A. Building and Grounds

- The old checklist will not be used, and building walkthroughs done in the past will not occur.
- The team may observe items it deems to be safety issues by merely being in the school building. Since there is no building check evaluation instrument being followed, such items could now be listed in this question’s text box as a concern or recommendation rather than as a deficiency.
- Note whether the school has either of two documents to confirm compliance with safety requirements:
  - A certificate or similar document from a local authority, such as a fire department, that has performed a safety inspection of the school; OR,
  - A certificate or similar document from a third-party inspection company that is knowledgeable in local fire, building, and life safety codes and that has performed a safety inspection of the school.
- The name of the inspecting entity should be noted as well as either the date of the inspection or the date of the report of the inspection. The date should be within approximately the past 12 months.
- If the school does not have a document, there should be a statement to that effect from the team, and the team marks a “no” on our evaluation instrument.
- Examine the document(s) and take one of three actions:
  - Action option 1: the document states that the school has no violations to address, which leads to a statement to that effect and a “yes” on our evaluation instrument.
  - Action option 2: the document states that the school has one or more violations to address, the violation(s) is/are listed, and all of these violations have been resolved, which leads to a “yes” on our evaluation instrument.
  - Action option 3: the document states that the school has one or more violation(s) to address, the violation(s) is/are listed, and one or more of these violations remain unresolved, which leads to a “no” on our evaluation instrument (i.e., it becomes a deficiency for us as well).

Examples:

1. Spokane Fire Department inspection report dated 11/15/16 listed no violations.
2. Spokane Fire Department inspection report dated 11/15/16 listed two violations: Stage curtain needs fire proofing, and flammable storage in the boiler room must be removed. School has resolved both violations.
3. Spokane Fire Department inspection report dated 11/15/16 listed two violations: Stage curtain needs fire proofing, and flammable storage in the boiler room must be removed. School has resolved the second violation, but it has not completed fire proofing of the stage curtains.

For something like 1 or 2, this would be a “yes” (in compliance).

For something like 3, this would be a “no,” and the school would need to let the team leader or ISBE know when the matter was resolved in order to move this to a “yes” (compliant). The specific violations yet to be resolved should be listed in the deficiencies section at the end of the visit report form.

B. Asbestos Plan

- If a school was built after asbestos ceased to be used, the school needs some sort of documentation of this fact from the architect, contractor, etc. This would take the place of the asbestos plan for the purpose of this compliance visit.
- A school that can document there is no asbestos in its physical plant may also apply to the State for waiver from needing an asbestos plan. This waiver would take the place of the asbestos plan for the purpose of this compliance visit.
• All schools would have such a plan, statement, or waiver, so the asbestos item cannot be N/A.
• The owner of a building being used as a school is responsible for creating an asbestos management plan and submitting it to the Illinois Department of Public Health.

C. School Lunch and Nutrition
• Item 1
  o If a school does not participate in the specified federal school lunch program, the appropriate box should be checked. The team should follow the instructions to arrive at the next indicated section of the evaluation instrument.
  o If a school does participate in the specified federal school lunch program, the team should answer the two questions listed.
• Item 2
  o If a school does not participate in the specified state school lunch program, the appropriate box should be checked. The team should follow the instructions to arrive at the next indicated section of the evaluation instrument.
  o If a school does participate in the specified state school lunch program, the team should answer the four questions listed as appropriate.

D. Student Athletes
• If a school has no interscholastic sports program, the school does not need these concussions and head injuries policies in place.
• Resources for this section may be found on the Illinois High School Association website at https://www.ihsa.org/Resources.aspx.
• Item 1a
  o The team actually is concerned here with two policies. If these do not appear in a policy document that is given to the parents, a recommendation should be made that they be so added.
    ✓ A policy requiring student athlete and parent signatures regarding the school’s general policy statement about concussions and head injuries.
    ❖ The policy statement must be on a form approved by the Illinois High School Association.
    ❖ The required action is that both the students and parents must acknowledge that they have seen the policy because they have signed it.
    ❖ Students and parents are not required to indicate having read the policy.
    ❖ The student may not participate in a sport in any way associated with the school involving physical contact—no practices (working alone or in groups) and no games—until both student and parent sign the policy. Since tryouts for sports teams often involve physical contact that could result in a concussion, the signed policy would need to be on file prior to tryouts as well.
    ✓ A general policy statement describing concussions and head injuries whose existence is implied by the student/parent sign-off requirement.
  o The contents of the school’s concussion policy are not at issue here. The sample form on the IHSA website has information content which suggests that content concerns are handled by the IHSA.
  o The signed policy document is often stored in files in the athletic director’s office rather than in the student files in the main office. This is an allowable option for the school.
• Item 1b
  o The IHSA has a form for the purpose of the required sports physical available at http://www.ihsa.org/documents/sportsMedicine/2014-15/Pre-participation%20Examination%20041114.pdf.
  o The 395-day span allows for the student to be eligible under a single sports physical for both the regular season and any play-off season.
• Item 2—these must all be in place. The school leadership should be familiar with 105 ILCS 5/22-80 in order to ensure all of its requirements are understood in detail and followed.
E. Student Health

- Correspondence schools may be N/A for some or all of these items.
- Various forms to be used to record student health data may be found at [www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx).
- The student health records are sometimes stored in files in the nurse’s office rather than in the student files in the main office. This is OK.
- Parents may present the school with a certificate of religious exemption to some or all medical procedures and examinations. The school evaluates whether it accepts the exemption request. The ISBE website has an [Illinois Certificate of Religious Exemption to Required Immunizations and/or Examinations Form](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx) for parents to use for this purpose.

**Item 1 [health examinations]**
- Some grade levels are specifically mentioned, but the requirement applies to all students who enroll for the first time in any Illinois public or nonpublic school.
- The health examination may include a tuberculosis skin test screening if the student resides in an area designated by the Illinois Department of Public Health as having a high incidence of tuberculosis.
- The Department of Public Health has rules and regulations specifying the examinations and procedures that constitute a health examination.

**Item 2 [immunizations]** — typically the immunization data are on the same document as the health examinations (Item 1).

**Item 3 [dental examinations]**
- Many times, the school visit will occur before the May 15 deadline mentioned in the evaluation instrument. If the team finds students missing this documentation but May 15 has not yet arrived, this is not a compliance issue. However, as a courtesy, please provide the names of these students to the school so the school is aware to get the documentation from the parents by the deadline.
- The school submits these data through IWAS. If the school needs help with this process, please refer them to the IWAS [Dental User Guide](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx).
- Additional resources can be found on the [Dental Health Webpage](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx) and at [http://www.dph.illinois.gov/topics-services/prevention-wellness/oral-health](http://www.dph.illinois.gov/topics-services/prevention-wellness/oral-health):
  - Learn more about student dental data collection by checking the [School Dental Examinations Information Sheet](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx).
  - Forms acceptable for the school year 2017-18 include the [IDPH Proof of School Dental Examination Form](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx), a tool for dentists to record student dental information.
  - The [IDPH Dental Examination Waiver Form](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx) is for students who are unable to obtain the required dental examination.
  - The [Dental Information-Data Entry Worksheet](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx) is a worksheet on which you can enter your data and double-check your aggregate numbers.

**Item 4 [vision examinations]** — Kindergarteners are specifically mentioned, but the requirement applies to all students who enroll for the first time in any Illinois public or nonpublic school. **Only a correspondence or online school** could be marked N/A for this and other items in part D.
- The school submits these data through IWAS. If the school needs help with this process, please refer them to the IWAS [Vision User Guide](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx).
- Additional resources can be found on the [Vision Health Webpage](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx) and at [http://www.dph.illinois.gov/topics-services/prevention-wellness/vision-hearing#forms-forms-vision-hearing](http://www.dph.illinois.gov/topics-services/prevention-wellness/vision-hearing#forms-forms-vision-hearing):
  - Learn more about student vision data collection by checking the [School Vision Examinations Information Sheet](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx).
  - Forms acceptable for the school year 2017-18 include the [IDPH Proof of School Vision Examination Form](http://www.isbe.net/Pages/Health-Requirements-Student-Health-Data.aspx), a tool for optometrists to record student vision information.
- The **IDPH Vision Examination Waiver Form** is for students who are unable to obtain the required vision examination.
- The **Vision Information-Data Entry Worksheet** is a worksheet on which you can enter your data and double-check your aggregate numbers.
  - [http://www.dph.illinois.gov/topics-services/prevention-wellness/vision-hearing#forms-forms-vision-hearing](http://www.dph.illinois.gov/topics-services/prevention-wellness/vision-hearing#forms-forms-vision-hearing)
- Items 5, 6, and 7 are policy and/or procedure items, so the evidence will be found in those kinds of documents.
- Item 7 refers to the requirements of items 1 and 2 and not to all of the health items listed here in Part D. That is, the state only requires an exclusion based on lack of a health examination and/or lack of immunizations. The state cannot require an exclusion based solely on lack of a dental or vision exam; however, the school may exclude based on solely on lack of a dental or vision exam, if it chooses.
- If a summary of these required documents does not appear in the parent handbook, a recommendation should be made that it is so added.
- This table, which may be helpful in examining student files, captures much but not all of what is in the bullet points above as well as what is in the evaluation instrument:

<table>
<thead>
<tr>
<th></th>
<th>K</th>
<th>1</th>
<th>2</th>
<th>6</th>
<th>9</th>
<th>First enrollment in an Illinois school</th>
<th>Any Grade</th>
</tr>
</thead>
<tbody>
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<td>X (if not done in K)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Immunizations</td>
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<td>X</td>
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<tr>
<td>Dental Exam</td>
<td>X</td>
<td>X</td>
<td>X</td>
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<tr>
<td>Vision Exam</td>
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</tbody>
</table>

**F. Safety Drills**

- Since a compliance visit may occur well before the end of the year, some drills may not have occurred yet. If such drills have been scheduled, mark the relevant item “yes.”

- **Item 2**
  - Bus drills are only required if the school uses a bus.
  - Schools not using buses and thus not needing the drill must document this with ISBE annually using the **form** created for this purpose. If the school decides to use a bus after submitting the form, the drill must then be done.
  - Schools may use buses only with segments of the student population, such as with an athletic team or with one grade for a grade-specific field trip. In such cases, the school need only conduct the drill with that student segment.
  - Whether a school does the drill or not, the curriculum portion dealing with safe driving/riding habits is still required. Some curriculum resources may be found at
    - [https://www.isbe.net/Documents/bus_safety_teach_guide.pdf](https://www.isbe.net/Documents/bus_safety_teach_guide.pdf)
    - [https://www.portlandoregon.gov/transportation/article/565224](https://www.portlandoregon.gov/transportation/article/565224)
    - [https://www.bikeleague.org/ridesmart](https://www.bikeleague.org/ridesmart)

- **Item 3** — The school may also conduct additional drills to account for other incidents, including earthquakes or hazardous materials

- **Item 4** — These drills may be conducted when students are not present in the school building.

- **Item 5b** — A compliance visit may occur well before the end of the year, which is when this report is normally submitted. This is fine so long as the school is aware of the requirement and
planning to meet it. Either a date of report submission or “in process” is then entered on the line, and this item is marked “yes.”

G. Art Supplies
- Checking paint, markers (including those for dry erase boards), and glue is probably sufficient.
- Usually the issue is paint, and the paint container normally will have “nontoxic” on it. Sometimes the school will have plastic trays with small oval cups that hold paint — the tray does not usually indicate toxicity. The nontoxic statement may be on the paper sleeve the tray came in, and the sleeve may have been discarded by the school. If this is the case, ask the school going forward to keep exemplars of containers or sleeves as evidence that materials are nontoxic.
- A statement that the item complies with ASTM D-4236 is a likely indicator that the item is nontoxic. This regulation requires that any toxic, corrosive, etc. elements be listed on the product label; if none is listed, this would indicate the product is nontoxic.
- The item may have a circular seal with a large “AP” in the center. This seal indicates the item is nontoxic.
- An individual item, such as a marker, may have no indication on it because the nontoxic marking is/was on the box or carton the item came in. Schools should be advised to retain exemplars of the various boxes, cartons, sleeves, etc. to document an item is nontoxic.
- If there are no such markings, the school might try the manufacturer’s website to see if a nontoxic assurance is available there.
- The school may have toxic materials where lower grades are present so long as the materials are locked or otherwise unavailable to the students and so long as it is only the teacher or students in upper grades who use the materials.

H. Eye Protection
- Note that one item listed involves kiln firing — this generally means a kiln found in an art classroom.
- Similarly, some of these other named activities may occur in art classes or other settings within a school.
- The eye protection could be in the form of goggles, safety glasses, or the like.
- The issues here are whether the students are supplied with eye protection when needed, whether sufficient numbers of eye protection devices are available to protect all students in a class, and how the eye protection devices are cleaned and stored so as to prevent infections and such transferring between students.

I. Student Medications
- A school might have a general student medications policy, and it is ok if the specific items in this section are included in that general policy. A separate policy statement for each item here is not required.
- If these policies do not appear in the parent handbook, a recommendation should be made that they are so added.
- Item 1—this requirement is about absolving the school of responsibility in case an injury occurs while school personnel are helping a child; it is a kind of “good Samaritan” provision.
- Item 2
  - 2a—The school must have a policy that allows for this situation to be true, so this item cannot be N/A.
  - 2a—The permissions and other documentation for item 2 must be renewed by the parent and physician annually.
  - 2b—The Department of Public Health has a sample asthma action plan at [http://www.idph.state.il.us/about/chronic/AsthmaActionPlan.pdf](http://www.idph.state.il.us/about/chronic/AsthmaActionPlan.pdf).
  - 2b and 2c—These might be marked N/A if a school has no students with asthma, but otherwise these policies must be in place.
- Item 3
• 3a and 3c— These might be marked N/A if a school has no students with diabetes, but otherwise these policies must be in place.
• 3b—The school must have a policy that allows for this situation to be true, so this item cannot be N/A.
• 3b—The permissions and other documentation for item 3 must be renewed by the parent and physician annually

• Item 4
  • 4a and 4b—These policies are not required, so one or both could be N/A.
  • Assuming the school has adopted a permissive policy allowing use of undesignated epinephrine pens (“epi pens”) and opioid antagonists, then the school must also allow parents to opt out of this use in writing.
  • If 4a is marked “yes,” then items 4c,i-v, are required.
  • If 4b is marked “yes,” then items 4c, ii and iv, are required.
  • The training of staff to administer medication through epinephrine pens must be repeated annually.
  • The presence of epinephrine pens in the school must be reported to ISBE by July 2.
    - This report is due whether or not the stock epinephrine was used.
    - This report is in addition to the mandated report on use, if any, of the school’s supply of undesignated epinephrine within three days of its use.
  • If either an undesignated epinephrine or an undesignated opioid injector is used, the reporting protocol in 4c, v, must be followed in addition to the reporting to ISBE.
Final Area

This area, especially the sections on Advice and on Deficiencies, should function as a kind of executive summary of the report, so be sure that all such items noted in the body of the report are repeated here.

- **Commendations**
  - List here relevant items for which the team feels the school should be noted.
  - It would be usual for a team to be able to identify something commendable at a school.
  - Team members are often familiar with a school from previous experience, so care should be taken to ensure that Commendations come from the experience of the team visit and not from other occasions.

- **Advice, Concerns, Suggestions, or Recommendations**
  - List here items that the team suggests the school address or offers ideas about better practices to follow.
  - Team members are often familiar with a school from previous experience, so care should be taken to ensure that Advice, Concerns, etc. come from the experience of the team visit and not from other occasions.
  - Where relevant, please indicate the section and item number to which the advice applies.
  - Advice, Concerns, etc. listed here are just that — advice.
    - These items have no impact on a decision regarding the school’s recognition status. The school may ignore anything typed here.
    - Therefore, make sure that items that should be under “Deficiencies” are not listed here under “Advice.”
  - All items earlier in the evaluation instrument that have been marked as “Recommendation included” should have the recommendation(s) repeated here.

- **Deficiencies**
  - List here items that have an impact on a decision regarding the school’s recognition status.
  - Please indicate the section and item number to which the deficiency applies.
  - **In general, “no” answers in the evaluation instrument MUST result in one or more items being listed in the Deficiencies section at the end of the evaluation instrument; however, there are a few cases, such as the meal program issues in Section IV, item C, where a “no” answer may be simply information and would not constitute a deficiency.**