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EQUITY AUDITS: A NEW MODEL FOR SCHOOLS WITHIN RESTRICTIVE SETTINGS

Matthew Phillip Milanowski, Ed.S.

Western Michigan University, 2023

This project creates a framework and process for conducting facility wide equity audits for schools within juvenile justice and restrictive settings. To accomplish this, an extensive review of existing literature in both the field of education and the field of juvenile justice and existing frameworks and processes were reviewed to create the new framework, Milanowski's (2023) *Facility Wide – Equity Audit Framework*, suitable for juvenile justice and restrictive settings. The new framework was then used to guide the development of a process, data collection tool, improvement planning tool, and fidelity instrument to evaluate the implementation of the overall process. This project lays the foundation for future refinement and application of facility wide equity audits in juvenile justice and restrictive settings.

EQUITY AUDITS: A NEW MODEL FOR SCHOOLS WITHIN RESTRICTIVE SETTINGS

by

Matthew Phillip Milanowski

A project submitted to the Graduate College
in partial fulfillment of the requirements
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Specialist Project Committee:

Louann Bierlein Palmer, Ed.D., Chair
Brett Geier, Ed.D.
Kristine Jolivet, Ph.D.

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This project started when I was first introduced to how equity audits were used by schools and districts in Dr. Louann Bierlien Plamer's Law, Policy, and Ethics course during the summer of 2021. After having wrestled with how, or if, equity audits were even applicable in my setting and conversations with Dr. Bierlien Plamer the project started to take shape. It is due to this and the guidance from the other two members of my committee, Dr. Brett Geier and Dr. Kristine Jolivet, that I would wish to first thank them first. This is especially the case for Dr. Jolivet, who provided me with opportunities to lead dialogue and presentation on the topic of equity audits in restrictive settings to further enrich my experience and knowledge on the topic.

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Matthew Phillip Milanowski

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Equity Audits for Schools within Restrictive Settings

This educational specialist project document covers my action research-based work related to creating the tools needed to conduct an equity audit for schools within restrictive settings. This document includes seven sections, with the first covering the introduction to the issue, the problem, and my research questions. The second section includes my literature review, while the third section covers the population involved in my project. The fourth section offers the proposed indicators for schools within a juvenile justice setting, based upon the literature review and my knowledge and experience in this setting. The fifth section offers a summary of how to implement the new faculty-wide equity audit, while the sixth section includes the results for such implementation. Finally, the last section covers the final step, which is the evaluation of the overall process.

Section I: Introduction

The problem of equity in education is not a new one faced by educators and educational leaders. One of the ways inequities in education are observed is by *achievement gaps*, which are created when one subgroup of students, usually those from more advantaged populations, outperforms another (National Assessment of Educational Progress [NAEP], 2021). Between 2005 and 2015, gaps in reading and math have not decreased significantly for any at-risk group of students according to the data gathered by NAEP. The passing of No Child Left Behind (NCLB) had emphasized closing achievement gaps and prompted a wave of educational reforms aimed at closing such gaps (Brown, 2010; Dodman et al., 2019; Hernandez & Marshall, 2017; Skrla et al., 2009). But without a proper understanding of the equity issues causing achievement gaps, some districts have invested large amounts in reforms based on what others have been

doing with little or no positive results effecting the inequities that cause their own achievement gaps (Khalifa, 2018).

Departments of Civil Rights from various states, including Michigan, have started to examine and address inequities that exist in schools by defining the problem and providing resources to schools. For example, in the Education Equity in Michigan Report (2020), the Michigan Department of Civil Rights (MDCR) identified school policies and practices as a contributing cause to disparities and inequities in our schools. To further define the problem, the lack of teacher diversity and culturally inclusive curriculum, absenteeism, varying levels of parental involvement, food insecurity, the quality of educational supplies, and access to highly qualified teachers were examples of equity concerns noted in this 2020 report. As a resource for schools, the MDCR provides resources for developing an equity plan to achieve equitable outcomes for all students. These plans also require a method to review all policies, practices, and procedures through an equity lens.

A method for reviewing and examining these equities and inequities within a school more closely is the *equity audit*. As a systematic way to assess the equity in school and district programs, teacher quality, and student achievement (Skrla et al., 2004; Skrla et al., 2009), equity audits identify the percentage of students within a certain subcategory, and compare them to the student population as a whole. For example, such an audit will examine the academic performance of Hispanic students (or any ethnic/racial subgroup) in comparison to the academic performance of all students within a given grade level. It will also look at the percentage of such subgroups within programs like special education and advanced placement courses in comparison to the overall percentage of such students. *Disproportionality* is examined, if data reveals things like 50% of all students in special education being students of color, when such

students only represent 25% of the total student population; or when such students represent only 10% of students in advanced placement courses, when it should be much closer to 25% in order to be proportional. Through identifying and examining disproportional data, schools can take targeted actions to address the policies and practices that are the root cause(s) of the inequities that exist.

Equity audits will differ from school to school, but should be built on the general principles for the process, or *equity audit framework*. Effective equity audit frameworks for schools have two key features, as identified by Capper et al. (2021):

1. the extent to which students are labeled in the school; and
2. equity related to specific areas of difference, including social class, race, language, ability, gender, sexual orientation/gender identity, and religion.

These provide the driving force for data collection during an equity audit. Further, according to Capper et al. (2021) data should be collected in four major areas for all students as broken down by social class, race, language, and ability:

1. Percent of students who identify as a specific subgroup within the school and how that compares with such percentages in other schools in the district.
2. Percent of students labeled for special education, gifted, and receiving response to intervention (RTI) support who are of that identity.
3. Rates of truancy and suspensions/expulsions for students who are of that identity.
4. Achievement data disaggregated by that identity, including participation in and scores on the ACT and graduation rates.

Most of the equity audit frameworks created by educational researchers will include the features and areas of data collection listed above, despite each framework being unique in its

focus. For example, Skrla et al. (2009) focuses mostly on the school, while both Green (2017) and Khalifa (2018) provide general principles in their frameworks for extending equity audit beyond schools and including the community as well.

Schools using existing equity audit frameworks have to elaborate on the general principles of the framework to meet their specific and unique needs. An example of this would be a school that offer different programming, such as arts and music, would look at data informing their policies and practices for scheduling those programs. Whereas, as a school that may not offer such programming may look at how they are referring students to local agencies or not look at it all.

Problem Statement & Project Context

Despite access to equity audit frameworks, schools across the country have been slow to implement equity audits to improve the success of reforms aimed at closing the achievement gap and creating more equitable settings for students (Khalifa, 2018). This is due to many issues, such as not having easy access to disaggregated data and time to do this work, as well as limited knowledge regarding the importance of such audit. Beyond this, the Mid-Atlantic Equity Consortium (MAEC) (2021) postulates that a further challenge may extend beyond accessibility and infrastructural issues. The MAEC notes that by its very nature an equity audit can cause conflict within a school, as it has the potential to highlight inequities believed to not exist. Due to staff typically not having a clear sense of inequities that exist, the entire process can be met with opposition on the basis that it is a waste of time.

Equity issues are exacerbated for the facilities and the schools providing academic programming and support engaged in the juvenile justice system. In 2019, 36,479 youth across the U.S. were engaged in the juvenile justice system (Hockenberry, 2022), and while there, must

be provided educational supports as required by compulsory education laws. Youth engaged in the juvenile justice system have one of two statuses: *detained*, those awaiting adjudication, disposition, or placement elsewhere, and *committed*, those held as part of a court-ordered deposition. Detained youth typically spend less time in juvenile justice facilities, with about 80% spending about a week, 64% for at least 15 days, and 46% for at least 30 days. Those youth who are committed typically spend more time in facilities, as about 81% spend a minimum of 30 days in the facility, 69% spend at least 60 days, and 58% are there for at least 90 days. There were also 12% of youth committed who spend over a full year in a juvenile justice facility.

Along with the variability in length of stay, juvenile facilities are faced with disproportionalities in the youth population. For example, minority races totaled 63% of youth in juvenile facilities in 2019, while only making up 48% of the entire youth population in 2020; White youth were 38% of those in juvenile facilities and 52% of the overall youth population (Hockenberry, 2022; Office of Juvenile Justice and Delinquency Prevention [OJJDP], 2020). The variability in length of stay and the disproportionate representation of the population make providing programming aimed at reducing recidivism, or the likelihood that a youth will reoffend, more challenging and complex.

Within the state of Michigan, there was an average of 1,389 youth either detained or committed to juvenile justice facilities per day from 2015 to 2019 (Sickmund et al., 2021). Within Kent County in this state, there was an average daily count of about 58 youth in the county's juvenile detention center from 2017 to 2019. Most of these Kent County youth are served by Lighthouse Academy – Waalkes (LAW), which provides education in the Kent County Juvenile Detention Center (JDC) for all youth in detention and residential programming.

In recent years, LAW, a strict discipline academy in Michigan, have been implementing initiatives to become more trauma informed, culturally responsive, and equitable. These initiatives are faced with challenges beyond those faced by public schools due to its setting. When looking specifically at equity as the population served does not come from a single community and is already, in many ways, a subset of the population. An equity audit framework and tool used by LAW should be chosen, or created, that takes the unique setting and challenges created by it into consideration.

Purpose Statement & Research Questions

Inequities in the field of education and juvenile justice have been researched in their respective fields. There has been some attention paid to education in juvenile justice facilities, like Larkin and Hannon's (2020) article discussing how to prepare teachers for teaching in juvenile justice settings; staff and teachers working in juvenile justice facilities need to be prepared to work with youth from minoritized and marginalized populations given the significant disproportionalities that exist within these populations. DelliCarpini (2008) also noted that teachers entering work in the juvenile justice system have not been adequately prepared to work with the student population and the challenges they face. The problem such teachers face due to the inequities that exist in the juvenile justice system and their lack of preparation is commented on further by Larkin and Hannon (2020), which includes walking in "unprepared for in the areas of cultural responsiveness, most specifically a socio-cultural consciousness, impacted how they assessed, validated, and prioritized their students' needs" (p. 487).

There is also research available on reforming the juvenile justice system, like the work being done by Bilchick, the Director Emeritus of the Center for Juvenile Justice Reform at Georgetown University, who has spent his career conducting field research on multi-system reform and the implementation of reform policies that will benefit underserved and at-risk youth.

Despite this research, there is a dearth of publications on the equities and inequities present in juvenile justice facilities. A rare article was published by Bilchick (2008) examining the question of whether or not equity was possible in juvenile justice systems, and found that it was possible with a key piece “understanding the policies and practices that reinforce and perpetuate inequities” (pp. 22-23). Yet, he does not make any connections to the potential use of an equity audit within such facilities to ascertain such information.

Overall, the current literature offers little focus on how to analyze where (and why) inequities are rooted in a juvenile justice educational system via a tool like an equity audit, let alone the impact of such equities for youth within this system. My project explored these inequities by addressing the following questions:

1. What accommodations and changes are needed to make existing equity audit frameworks suitable for a juvenile justice school setting?
2. Using a newly created equity audit tool developed for educational programming within a juvenile justice facility, what does an equity audit tell us about equities and inequities in the school and facility?
3. How can the data collected be used to improve policies and practices in collaboration between the school and facility staff?

This project aimed to answer these questions by evaluating and manipulating existing available equity audit frameworks and tools, and created an equity audit tool suitable for use by a school within a juvenile justice setting, and conducted an equity audit and analyze the results. A key challenge was that the equity audit framework adopted or developed had to lead to meaningful and useful data that could actually be collected within a juvenile justice educational environment.

This project also considered the need to generalize the framework beyond the specific school in order to align with multiple locations and/or a district equity audit process. In the next section, a review of literature provided information connecting education and juvenile justice and describe currently available equity audit frameworks.

Section II: Literature Review

Schools in juvenile justice facilities are a critical part to the attempt to rehabilitate juvenile offenders through programs of early intervention, diversion and effective community programming (MIDHHS, 2022). In order to build a better understanding juvenile justice facility and the inequities in them, literature review will start with by exploring how equity is addressed in the field of juvenile justice. Further, the literature review will provide more detailed description of equity audits within more traditional educational organizations. Hanover Research (2020) published a research brief that noted three prominent frameworks used by districts and schools for equity audits, and one other was found via other sources.

Disproportionate Minority Contact (DMC)

The search for variations of “equity audit” in databases used for juvenile justice literature yielded no useable results for this project. After work with a Western Michigan University library research specialist, it was discovered that the field of juvenile justice uses the term *disproportionate minority contacts* (DMC) when examining the overrepresentation of minority youth involved in the juvenile justice system. While the existence of an overrepresentation of minorities in the overall justice system has been observed since the early 20th century (Sellin, 1935), it was not until the 1980s that specific actions were mandated to occur at a federal level. The Juvenile Justice Delinquency and Prevention Act (JJDP), originally passed in 1974, was amended in 1988 to include the DMC mandate, which requires the collection of data on minority

contacts. While this led to over three decades of data showing the presence of inequities in minority contacts with the juvenile justice system, it was not until 2018, when the JJDPA was reauthorized and amended to include the requirement for specific actions to be taken to reduce *racial and ethnic disparities* (R/ED), which replaced the terminology of DMC in the most recent reauthorization of the JJDPA.

The Office of Juvenile Justice Delinquency and Prevention (2020) works with states to meet the new requirements to examine their policies, practices, and systems that may be leading to disproportionate minority contacts and then implement strategies to reduce that number. In order to support this, data collection areas have been reduced to five areas:

1. Arrest
2. Diversion (filing of charges)
3. Pre-trial detention (both secure and nonsecure)
4. Disposition commitments (secure and nonsecure)
5. Adult transfer

Disproportions in data collected in these five areas are required to be addressed in comprehensive plans submitted to the OJJDP. Each three-year plan is to be reviewed annually and tied to federal funding if a state fails to address overrepresentation. These plans cannot include an established or required numerical standard or quota on the number of juvenile members of juvenile groups to further encourage that disproportionalities are addressed at their cause.

This information will be helpful when collaborating with juvenile justice facilities. It supports the parallels in the goals to provide equitable opportunities for youth and students, as

well as providing a foundation for a common vocabulary to be built when having dialogues around this issue.

Common Equity Audit Frameworks for Traditional Schools

This section of the literature review examines existing frameworks in education that will be used to inform the decision made to choose, or create, a framework that will be “doable” in the juvenile justice setting.

Skrla et al.’s Framework

An early framework was initially published by Skrla et al. (2004), who focused on the goal of achievement equity through a simple equation of teacher quality equity plus programmatic equity equaling achievement equity. Each part of this equation is comprised of four indicators. Teacher quality is measured by (1) teacher education, (2) teacher experience, (3) teacher mobility, and (4) teacher certification (Skrla, 2009). For school level equity audits, the dimension of teacher quality is linked to student learning and achievement. The data collected for each of the indicators focuses on distribution across the campus of teachers with the highest degrees and most experience, as well as where new teachers are assigned and how teacher certifications are used (Skrla et al., 2009).

Skrla et al. (2009) change their focus when looking at the other two dimensions of equity audits by focusing on the disproportionality of groups represented in programs and academic achievement. Programmatic equity is broken up into the following indicators: (1) special education, (2) gifted and talented education, (3) bilingual education, and (4) student discipline (Skrla, 2009). The school level equity audit focuses the proportion of students assigned to the programs compared to their proportion of the overall school population (Skrla et al., 2009). Similarly, for the student achievement indicators, which are (1) state achievement tests, (2)

dropout rates, (3) high school graduation tracks, and (4) SAT/ACT/AP/IB results, the equity audit will focus on the gaps between groups and the disproportionality of the different groups (Skrla, 2009).

The recommended process for implementing this framework is to be conducted in seven steps:

1. Create a committee of relevant stakeholders.
2. Present the data to the committee and have everyone graph the data.
3. Discuss the meaning of the data, possible use of experts, led by a facilitator
4. Discuss potential solutions, possible use of experts, led by a facilitator.
5. Implement solution(s)
6. Monitor and evaluate results.
7. Celebrate if successful; if not successful, return to step 3 and repeat the process.

(Skrla et al., 2004; Skrla et al., 2009).

Green's Framework

Following the work done by Skrla et al., Green (2017) built on the established framework to design a framework that places an emphasis on being present and active in the community.

The community-based equity audit is a process that includes four phases: (a) disrupt deficit views of community, (b) conduct initial community inquiry and shared community experiences, (c) establish Community Leadership Team (CLT), and (d) collect equity, asset-based community data for action. Green recommends that all teams begin by disrupting deficit views of the community, but teams do not have to apply the phase in any prescribed or particular order. Each phase has practical actions for principals and their teams to take and allow for modifications based on the context and needs of the setting.

For the first phase, disrupting deficit views of the community, principals should start by creating a nine to twelve-member school-based team that is representative of the community to initiate the work. Green (2017) recommends this team complete two tasks before moving to another phase: (a) identifying equity-based core beliefs and (b) assessing the effectiveness of current practices.

Next, phase two's purpose within Green's (2017) model is to develop a connection to the community. To do this, school leaders and teams should complete three tasks: (a) community asset mapping, (b) interviews with community leaders, and (c) have shared community experiences. These activities will not only increase the connection to the community, but provide a foundation for phase three. In phase three, the school-based team invites community leaders to join the team and form a Community Leadership Team (CLT). This phase and process is important to get right, as the CLT will be the primary driving force of the rest of the work.

Finally, phase four helps the CLT contextualize the setting, assets and inequities in the community and school through three subsections. First, the CLT will collect data on school-community history in order to understand how changes happened over time and how the current state of the school and community shape inequities (Green, 2017). Next, the CLT will use demographic and key opportunity indicators to identify disproportionalities that exist in the community when compared with the community's city. Green recommends that the CLT look at the following indicators by the communities ZIP code:

- a. total population
- b. total population disaggregated by race
- c. median household income and disaggregated income levels by families
- d. total unemployment rate and disaggregated by race

- e. total poverty rate and disaggregated by race
- f. graduation rates, and
- g. number of individual twenty-five years and older with an associate's degree or higher. (p. 27)

When combined with the historical data collected in the previous subpart, this data will provide a more complete picture of the community for the CLT when moving into the final subpart. The third subpart is a series of ongoing meetings for critical community dialogues (CCD) of which there are four types. Green (2017) identified the community aspiration dialogue, community opportunity dialogue, community planning dialogue, and community action dialogue for the CLT to set aspirations, identify the root cause and solution to inequities, develop an equity-focused vision, and put it all into a plan of action to be implemented.

Khalifa's Framework

The final framework identified by Hanover Research (2020) is from Muhammad Khalifa who provides an equity audit framework as a part of a larger plan for culturally responsive school leadership (CRSL). As a starting point for CRSL, Khalifa (2018) developed a comprehensive framework for equity that included four areas: equity trends, survey data, policy analysis, and culturally responsive curriculum, pedagogy, and leadership. The first two areas, equity trends and survey data, establish a detailed view of the equity landscape through an examination of multi-level data and survey results in essential equity areas (Khalifa, 2018). The patterns of inequity lifted from the data can be contextualized by conducting a policy analysis. This third area looks critically at policies that may disproportionately effect minoritized groups of students. The fourth area deepens the analysis in area three to examine inequities in the curriculum, instruction, and leadership practices).

Capper et al.'s Framework

Another equity audit framework was developed by Capper et al. (2021) to “support the comprehensiveness and effectiveness of a school-based equity audit” (p. 264). The framework provides an equity audit process that includes six-phase:

1. identifying integrated/inclusive practices as measured by proportional representation as the anchoring philosophy of the equity audit,
2. establishing the team to conduct the equity audit,
3. designing the audit,
4. collecting and analyzing the data,
5. setting and prioritizing goals based on the data, and
6. developing an implementation plan. (Capper et al., 2021, pp. 264-270).

Overall, while this listing of equity audit frameworks is not exhaustive, it does include the some of the most current and influential work available. The information from this review will be used in this project to develop an equity audit framework for use to collect data, identify inequities, and evaluate policies, practices, and systems at Lighthouse Academy – Waalkes.

Section III: Populations Involved

Students

Lighthouse Academy – Waalkes (LAW) serves all students, grades kindergarten to twelfth grade, who are in detention and residential placement at the Kent County Juvenile Detention Center (JDC). Since LAW opened during the 2012-2013 school year, there have been more than 7,860 student enrollments, with 4,858 of those being non-duplicated enrollments, or non-duplicated student enrollments. The JDC serves the entire county, which provides a mix in the student population of mostly urban and suburban.

Table 1 provides the percentage of the student population involved in this school during the past five years, as broken down by four demographic subgroups: gender, ethnicity/race, English language proficiency, and disability. The majority of students identify as male, which is disproportionate to the overall county population of males. The U.S. Census Bureau (2020) estimates that 51% percent of the population in Kent County is male.

Table 1

Student Gender Percent of Total Over Time

Gender	2020-2021	2019-2020	2018-2019	2017-2018	2016-2017
	%	%	%	%	%
Female	29	28	27	27	30
Male	71	72	73	73	70

Gender is not the only subgroup that is disproportionately represented at LAW. Table 2 shows how each ethnicity and race are represented as a part of the student population over the past five school years.

Table 2

Student Ethnicity/Race Percent of Total Over Time

Ethnicity/Race	2020-2021	2019-2020	2018-2019	2017-2018	2016-2017
	%	%	%	%	%
Asian	<1	<1	0	2	1
Black	55	55	45	54	46
Hispanic	10	10	13	9	12
White	20	22	26	26	30
Other	15	12	12	10	11

Table 2 shows that Black students make up the largest percentage of the student body, despite Black individuals only making up 9% of the total population in Kent County (U.S. Census Bureau, 2020).

It is important to note that while the student population is determined by juvenile arrests and the Kent County Family Courts, it is the LAW's responsibility to provide an education that

is freely and equitably accessible to all students. The same holds true for students with limited English proficiency (LEP) and students with disabilities. Table 3 provides the percent of the total student population that were identified as belonging to a *special population*, or as having LEP and/or as living with a disability.

Table 3

Students Identified as a Special Population Over Time

Special Pop.	2020-2021	2019-2020	2018-2019	2017-2018	2016-2017
	%	%	%	%	%
LEP	8	6	8	6	6
Disability	26	30	27	28	23

It should be noted that these special population numbers (as shown in Table 3) are estimates due to an issue with the school information system (SIS). This issue removes students identified as special populations when they transfer to a new district, which is a frequent occurrence. The percent of students with LEP and living with disabilities is most likely higher than reported on this table. However, the information on the table does help to provide a description of the school. For perspective, the state-wide school population includes 13.4% of students living with disability. That is even lower in Kent County, which has a student population that includes 12.2% students living with disabilities.

Beyond student demographics, days of enrollment is another important data point. Students within LAW have been enrolled for longer periods of time in recent years, whereby the length of enrollment has increased from a low of nine days in 2013-2014 to slightly over 20 days in 2020-2021. While the length of stay had been fairly consistent from year to year prior to the 2019-2020 school year, the global COVID-19 pandemic seemingly had a substantial effect on length of enrollment. From 2019-2020 to 2020-2021 length of enrollment jumped by an average

of 6 days for students. The 2021-2022 school year saw a plateau, as the length of enrollment settled at about 20 days.

Due to the short lengths of enrollment, student achievement measures traditionally used by school are not effective. While students at LAW take district and state assessments, they are not a representation of the student's achievement. Instead, the school reports student achievement to the district in the form of short-term learning objectives in mathematics and reading, as well as in the form of academic credits earned. Graduation rate is also not something that accurately represents the quality of teaching and learning; however, it should be noted that students can and have graduated from LAW.

Staffing and School Operations

LAW employs a total of 14 staff, which includes teachers, paraprofessionals, special education, and administrative staff for academic instruction and to support the operations of the school. There are five general education teachers, one for each core subject area, which are English, mathematics, science, and social studies, as well as a physical education teacher. The teaching staff demographically are 100% White, 60% female, and are all over the age of 35 years old. There are two teachers who have one to five years of experience teaching, with the remaining teachers having five or more years of teaching experience. All meet the standard of being "highly qualified" set by the state. There are four paraprofessionals employed as student support staff. All of these staff are White, female, and 75% are over the age of 35. Their experience in the role varies, however, all have been in the role for fewer than five years. To meet the needs and requirements for special education programming and services, the school is assigned a teacher consultant and a school social worker by the district who split their time between one other similar site. Both the teacher consultant and school social work are White,

females and have been with the district for fewer than three years. Administratively, the school has a principal, part-time office manager, and student advocate, whose role is to schedule classes and maintain student graduation and academic plans. The administrative staff is 100% White, 66% female, and vary in experience. The principal, a White male, has been in the role for three years, while the office manager and student advocate have both been in their role for over five years.

Operationally, the school is on a balanced calendar and a Monday through Thursday schedule. Students are scheduled in six class periods per day, which include their four core subject areas, physical education, and an advisory period for skill building and enrichment. Students are scheduled based on their needs, which results in classes with multiple sections simultaneously for the teacher to provide instruction. When a student needs a course that the school does not have a teacher certified to teach, an online (or virtual) learning option is used to meet that student's need.

Further, in the partnership agreement with the facility, school staff are joined by facility staff in the classroom. The primary role of the facility staff is to ensure that a safe and secure environment exists by addressing student socio-emotional needs and behavior issues in the classroom. The facility staff is made up of approximately 12 staff youth specialist staff, who work directly with students, during first shift and one to two shift supervisors to support the school. The staffing rotates and the demographic make-up of the staff also changes based on who is scheduled to work. Despite this the facility staff, while not completely representative, is more representative of the student population than the school staff.

Section IV: Creating an Equity Audit Framework for Schools in Juvenile Justice Settings

During the process of adopting, or creating, a “doable” equity audit framework for schools housed within a juvenile justice setting, several existing frameworks for traditional school were reviewed (i.e., Capper et al., 2020; Khalifa, 2018; Green, 2017;_-Skrla et al., 2009) offered helpful insight regarding the approach and a foundation for extending the school equity audit process into more restrictive school settings. Yet, despite the community-based approaches developed by Green (2017) and Khalifa (2018) extending equity audits beyond the school as the sole focus, no frameworks exist to account for the complexities and nuances of schools operated within the juvenile justice system.

The student population enrolled in a school within a state or privately-operated juvenile justice facility is determined by state and county law enforcement and court policies, procedures, and practices per complicated entrance and assignment criteria which in turn may then lead to disproportionalities at other key decision points in the juvenile justice system (Development Services Group, Inc., 2014, pp. 3-5; Fix, 2018, pp. 6-9). The disproportionalities that exist in the student body of juvenile justice facility create needs that are not appropriately or fully addressed by the reviewed equity audit frameworks. These frameworks were designed for traditional public schools who get a less filtered student body based on the demographics of the community (Fix, 2018, pp. 6-9). For example, traditional public schools will have a percentage of students who are considered at-risk, while every student in a juvenile justice facility school would be considered an at-risk population. Disproportionalities and inequalities at entrance to and exit from juvenile justice facilities exist with these facilities also tasked with providing educational opportunities to an already disproportionately represented student body.

Indeed, there are many complexities within juvenile justice facilities. For example, the programming and services provided to youth may be provided by external agencies not fully governed by the policies, procedures, and practices of the specific facility. For example, a local literacy center may only be able work with individuals you have Limited English Proficiency (LEP), or a nonprofit group may only offer parenting classes for young African American males. This could create inequities in what youth have access to while in detention or residential placement. Given these complexities and the multiple persons and agencies responsible for deciding on and implementing educational programming, a multi-layered equity audit approach is warranted to account for accessibility across persons, agencies, and organizations as well as the ability to gather and monitor data even if everyone does not participate in the equity audit process.

A New Equity Audit Framework

Based on these reasons and the established frameworks not accommodating the need for resilience and a multi-layered approach, a new equity audit framework that is suitable for schools in restrictive settings. Schools in restricted settings need to develop resilience to the external policies, procedures, and practices of other areas of the juvenile justice system. Further, there are multiple programming layers created by the need for diverse services needed to effectively run the facility and the school must be able to cooperate as one of those layers. A new framework, Milanowski's (2023) *Facility Wide-Equity Audit*, was constructed based on the integration of: a) review of the existing educational equity audit frameworks, and b) my personal history of working in juvenile justice setting across educational roles (e.g., teacher, principal) for over five years.

This new equity audit framework for schools within juvenile justice settings was adapted primarily from the work of Skrla et al.'s (2009) equation and the 12 indicators for equity in schools. Since multiple discipline areas (e.g., courts, health care, mental health, education) collaborate to provide services within a whole-youth development lens for youth served in juvenile justice facilities, this needed to be accounted for in the new framework. Thus, a multi-disciplinary view in which education is a program was added to Skrla et al.'s (2009) model. Also, parts of the simplistic equation, teacher quality plus program quality equals student achievement, have been renamed to signify the broadened focus. Finally, a fourth part is added bringing in some of the work integrating the community into the process done by Green_(2017). These four parts will have several indicators to guide the team in collecting data, analyzing data, and making decisions based on the data and include:

1. staff quality;
2. program quality;
3. whole-youth achievement; and
4. community involvement and resources.

Staff Quality Indicators

The quality of the individuals working with youth in the facility is important for providing equitable educational programming. The indicators to gauge staff quality include two from Skrla et al.'s (2009) education level and experience, and two new indicators: professional learning/training and staff satisfaction (See Figure 1).

Figure 1

Staff Quality Indicators Summary

Indicators	Definition	Example
Experience	The number of years worked within the juvenile justice facility.	If the data were to show that those with the most experience are white males, it may indicate that there is an inequity in retention practices adversely impacting female and non-white staff members.
Education	The highest level of education is completed by the staff member.	This data may show a disparity in the hiring and promotion practices, if for example non-white staff had a higher level of education than white staff, indicating that the bar is higher for non-white staff to be hired.
Professional Learning & Training	The rate at which staff stay up to date with learning and training at the facility.	This data may show a discrepancy in the training offered or time provided to one subgroup over another subgroup.
Staff Satisfaction	The attitude and feelings brought to the facility by staff while working.	A staff satisfaction survey may indicate a inequities in policy and/or practice if one subgroup is less or more satisfied than others.

Professional learning/training was added due to the importance of persons, agencies, and organizations staying current on educational practices and to regularly review and implement evidence-based frameworks, programs, and strategies meant to create a safe and secure environment within the juvenile justice school. Finally, *staff satisfaction* was added to account for the effect a positive staff outlook may have on the youth they interact with daily.

Program Quality Indicators

The second part of the framework involves the quality of programs provided by and involved in the day-to-day operations of the facility. The indicators to guide the analysis of program quality are: a) youth grouping and housing, b) education, c) health and wellness, and d) behavior management and therapy (See Figure 2).

Figure 2

Program Quality Indicators Summary

Indicators	Definition	Example
Youth Grouping and Housing	The facility's options for housing units and what students are placed in them.	This data may be used to identify inequities for subgroups placed in more secure housing units with fewer privileges than other subgroups.
Education	The education options available to students may include high school completion, adult education, and higher education or training programs.	If the number of non-white students enrolled in online learning than white students, this may show a disparity in the scheduling practices of the school, especially if there is more support available for traditionally taught classes.
Health & Wellness	Students have access to physical and mental healthcare within the facility.	Data in this area could indicate an inequity in the level of access one subgroup has that is better or worse than the others.
Behavior Management	The approach or model used by the facility to create a safe environment for staff and youth.	If the data shows a disproportionate number of students from a subgroup receiving behavior referrals, this may indicate an issue with the practices staff are using when implementing the behavior management program.

Due to education being a program itself in juvenile justice facilities, the indicators for program quality were completely changed from Skrla et al.'s (2009) framework. *Youth grouping and housing* provides information on the decisions made about youth placement and includes the decisions made if there were distinct types of housing programs, such as detention and residential, or minimum security and higher security.

Education is the area of programming where many resources and time are devoted each day. Youth in the juvenile justice system will mostly still qualify for high school completion (HSC), or a path to earning their diploma, but there are also instances where a high school equivalency (HSE), such as the GED, is more appropriate. This is one of the subcategories that may be examined for educational programming. Other subcategories also include enrollment in

programming for special populations (Special Education and Limited English Proficiency), advanced placement, online learning, and career and job skills training. These subcategories can be examined to identify disproportionalities in student placement. For example, the data could show that a disproportionate number of youths with IEPs are enrolled in online courses, which could point to an inequity in the procedure for enrolling students. Other areas that should be considered if they are applicable to an organization are online offerings and student movement in a multi-tiered system of support (MTSS) for academic areas.

Facilities also provide some level of *health and wellness* programming and services. Information in this area based on student requests for medical or mental health attention, and the number of times those requests are honored, are important to analyze for inequities in staff practices and program policy. Facilities might also provide aspects of preventative health and personal wellness. These programs could be analyzed as a subcategory for the existence of inequities, as they may not be available to all youth.

The last indicator for program quality is behavior management provided to youth while at the facility. Referral data and fidelity tool information should be collected and analyzed to identify inequities that might occur because of a behavior management program's implementation. Having the referral data can help to spot if certain groups of students have behavioral referrals over other groups, while the fidelity tool data can help to identify if potential inequities are the result of the program or the individuals implementing the program.

Whole-Youth Achievement Indicators

Whole-youth achievement was revised to include more than just academic achievement. This is due to the multiple goals for youth when they are in programming at a juvenile justice facility intended to support their successful reentry to the community. In addition to academic

achievement, the new indicators for whole-youth achievement include: a) risk factors, b) behavior referrals, and c) rate of return (recidivism) (See Figure 3).

Figure 3

Whole-Youth Achievement Indicators Summary

Indicators	Definition	Example
Academic Achievement	Students' performance in academics based on progress, assessment scores, and observation.	If a disproportionate number of students from one subgroup are making less progress than other groups, this may indicate an inequity created by the curriculum or teacher practices.
Risk Factors	Screening and survey results showing the potential need for intervention.	If a disproportionate number of students from one subgroup are showing more risk factors, it would lead to a closer look at policies, practices, and current events that might be causing that disparity.
Behavior Referrals	The rate at which a student receives consequences for not meeting the expectations of the facility.	Behavior referral data can indicate a group that might be adversely impacted by a behavior policy and/or inequities in staff implementation of the behavior management system.
Rate of Return (Recidivism)	The number of students who return after returning to the community setting or placement.	If there is a higher disproportionate rate of students of color returning to the facility, there may be inequities in the transition planning process and how it is implemented.

The indicators for this part of the framework are meant to capture the impact of the staff and programming available to youth on youth. *Academic achievement* is the primary indicator for quality. In looking at risk factors, the audit will account for the quality of the health and wellness programs and traditional education programming. *Behavior referrals* is an indicator of the number of times a youth is reprimanded for not meeting the expectations set for them. Finally, the *rate of return (recidivism)* looks at the number of youths who return to the facility after returning to the community. This indicator may be more appropriate depending on the type of facility (e.g., detention center or jail versus residential facility).

Community Involvement and Resources Indicators

The final part of the framework, community involvement and resources, is added for the equity audit team to evaluate the external resources available for youth while they are in the facility and upon their release to the community at large (See Figure 4). This can be done by facility and program leaders and teams developing connections with community-based agencies and leaders to support youth in the juvenile justice system (Green, 2017, p. 20). Green (2017) has identified three key actions, of which two are used as indicators for this part of the framework, *asset mapping* and *meeting with community leaders*. The other two indicators are *external agency programming*, or programming outside of regular programming provided by a community organization, for the youth; and *student transition planning*, or the plan put in place to support the student as they return to the community after being in the facility.

Figure 4

Community Involvement and Resources Indicators Summary

Indicators	Definition	Example
Asset Mapping	Identified support in the community that students can rely on when they are released.	A review of an asset map during an audit may find that inequities exist in the type of resources are provided to youth when they are released (I.e., only Christian organizations, despite a Muslim population at the school).
Meeting with Community Leaders	Outreach and collaboration with community leader's stakeholders in the success of youth returning to the community.	There may be an identifiable disproportionality in the backgrounds of community leaders who are interacting with the facility, which could indicate the need to seek out a better representation to be involved.
External Agency Programming	Experiences provided to youth in the facility by agencies in the community beyond what they receive from the facility.	An audit could identify that the external agencies programming does not include all youth at the facility and that a policy issue is causing an inequity for which youth have access to this programming.
Transition Planning	Plans put in place for students to be successful when returning to the community.	An audit of transition plans could find that students housed in different areas may not all participate in transition planning due to staff practices.

When youth are discharged from the facility to the community, many of them will still need support to be successful. By practicing *asset mapping* and *meeting with community leaders*, a facility can provide information to youth to find support once they have returned to their community. *External agency programming* is a method that can provide more programming options for the facility and get students connected and familiar with support in the community before they are discharged. However, it is important to analyze these indicators on how diverse the options are, as well as the access that students have to this information and programming through policy, procedures, and practices at the facility.

The fourth indicator in this area, *transitions planning*, is, in large part, a summation of the other indicators in this area. Students should have a plan when leaving the facility that will give them a guide to success. Facilities must look at the rate of plans and the quality of plans as a part of this indicator, which will have an impact on students' rate of return and dropout rate from school. See Figure 4 for summary of the community involvement and resources indicators.

Summary of All Indicators

Figure 5 shows a simplified view of the four major components and 16 indicators that make up this new framework, Milanowski's (2023) *Facility Wide-Equity Audit*.

Figure 5

Four Components and Indicators within Milanowski's (2023) Facility Wide-Equity Audit

Staff Quality	Program Quality
Education	Youth Grouping and Housing
Experience	Education
Professional Learning/Training	Health and Wellness
Staff Satisfaction	Behavior Management and Therapy
Whole-Youth Achievement	Community Involvement and Resources
Academic Achievement	Asset Mapping
Risk Factors	Meeting with Community Leaders
Behavior Referrals	External Agency Programming
Rate of Return (Recidivism)	Transition Planning

Section V: Implementing the New *Facility-Wide Equity Audit Framework*

The second stage of the project was to implement the framework that has been developed and described in earlier sections of this paper. This section of the paper summarizes both the preparation and the process used at Lighthouse Academy – Waalkes within the Kent County Juvenile Detention Center to conduct an equity audit using the Facility Wide Equity Audit Framework. The data collected and analysis discussions are also presented and explored as a part of this stage of my specialist project.

Preparing to Conduct an Equity Audit

In preparation for conducting the first equity audit at Lighthouse Academy – Waalkes (Waalkes), there were three activities, or tasks, to be completed: a) determining who would be involved, and creating a team, b) establishing the process, and c) creating a data collection tool. All tasks are especially important for the inaugural audit, as they were establishing the foundation on which future audits will improve.

Preparation Step 1: Creating the Team

The first activity in preparing to conduct an equity audit is to determine who is to be involved. I started by consulting the literature, which placed an emphasis on developing a team or committee early in the process that included representation from a diverse set of roles in the school and community (Capper et al., 2021; Green, 2017; Skrla et al., 2009). Green (2017) suggests keeping this group small with only three formal members and two informal members from the community, while Capper et al. (2021) suggests a larger group with the number of members recommended to be between eight and ten, with 12 being the maximum. Taking this into consideration, along with understanding that the multiple agencies charged with the care and education of youth within the facility each have their own leadership and/or improvement teams already established, I decided to develop a team comprised of a representative from each of these teams.

Preparation Step 2: Establishing the Process

Once the team was determined, the task of setting the equity audit process was next. Recommendations from the authors of other equity audit frameworks provided a starting point for the team. Common steps present in the recommended process for conducting school equity audits include collecting data disaggregated by protected classes, analyzing and discussing the data, presenting the data to the larger teams and stakeholders, and creating, implementing, and monitoring a plan of action to address any inequities found through the process (Capper et al., 2021, Green, 2017, Skrla et al., 2009). These commonalities depict the process used for conducting the equity audit at Waalkes, starting with the first step *collecting the data*. During this step, the indicators in each area of the framework are to be used as a guide. The data

collected then needs to be disaggregated by gender, race and ethnicity, disability, and English language proficiency.

During step two, the team needs to analyze the data for disproportionalities between different groups and the policies and/or practices responsible for creating the inequity. For example, in the area of youth grouping and housing, 9% of students placed in residential treatment were students living with a disability, while 22% of all students in the facility are living with a disability. This might indicate that a policy or practice is limiting the number of students with a disability placed in residential treatment and causing inequity. Once the data is analyzed, the team next needs to *present the data* during step three. The data is not only brought back to each member's leadership or improvement team but also must also be presented to other stakeholders in related agencies and the community. When the data is presented, the team must answer questions when appropriate and solicit feedback and input on possible causes and action steps to address inequities.

The fourth step will use the input from the previous step to *develop an action plan*. The action plan should address the highest priority inequities by changing policy and impacting positive changes in staff practices. An example of an action plan might deal with language in the policy for residential treatment at the facility that is causing confusion over whether students with disabilities are eligible for the program. Language clarification might also be followed up by retraining the staff responsible for determining placement for programming in the facility. The last step is then to *monitor and evaluate the action plan* as it is implemented. The equity audit team must meet regularly to evaluate the progress and make updates as needed to ensure that the action plan is successful in addressing the inequity.

Preparation Step 3: Identifying Data Collection Tool

The final task to complete in the preparation for an equity audit is to create and/or decide upon a data collection tool. Both Capper et al. (2021) and the Mid-Atlantic Equity Consortium (MAEC) (2020) offered examples that were used by me when creating a tool to support this equity audit process. The resulting data collection tool is organized by the areas and indicators of the overall framework for *Facility-Wide Equity Audits* and contains a combination of quantitative and qualitative data.

The full tool is 17 pages in length (see Appendix C), while an extraction from this tool is shown in Figure 6. The example provided in Figure 6 is from the Staff Quality area of the framework and would be used to collect and analyze data on the Staff Education indicator by filling in the appropriate numbers, fractions of the whole, and percent of staff with each level education.

Figure 6

Facility Wide Equity Audit Data Collection and Analysis Tool

2. Staff Education High Degree Earned	Number	Fraction	Percent
1. Having a high school diploma. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Having a GED. Disaggregated by race:			
<i>African American/Black</i>			

Conducting an Actual Equity Audit Using the New Tool

An initial Facility Wide Equity Audit was completed for the first term of the 2022-2023 school year at Lighthouse Academy – Waalkes and the Kent County Juvenile Detention Center. The following contains a description, or summary, of each step in the established process completed by the team. These steps follow those detailed in the previous section on preparing for the equity audit in which a team was formed, a process was developed, and an instrument was created for use within the audit. Note: Since this was the first time such an equity audit was undertaken, and there were some changes in key organizational personnel during the period of the audit (as detailed in a later section), these initial audit efforts were a somewhat limited in its overall scope, and could be considered more of a pilot equity audit.

Conducting Audit Step 1: Collecting the Data

Using the Facility Wide Equity Audit Data Collection and Analysis Tool created for the equity audit, I led the data collection process. This started with collecting the data available through the school's *student information system (SIS)*, which is the program the school uses for attendance, enrollment, scheduling, grading, and other student information collection, before using other publicly available information sources, and requesting information from other agencies and individuals.

The SIS provided a great deal of youth information for the audit, which was mainly possible due to all students being enrolled in the school during the intake process. This includes student demographic information disaggregated by ethnicity/race, gender, disability, and limited English proficiency, as well as youth grouping, educational programming, and academic achievement data. Data for the community was collected from the US Census Bureau and the State of Michigan school database, MI School Data, to provide a contextual reference point for

the data collected specific to the facility. This included the student demographic information for Kent County, Michigan disaggregated by ethnicity/race, gender, disability, and limited English proficiency, as well as the overall county population disaggregated by ethnicity/race and gender. Information for non-school related was requested from the facility administration and other agencies. This includes information in the staff quality area, the health and wellness indicator, behavior programming and Referrals, and transition planning. The qualitative data for indicators like staff satisfaction and the indicators in the community involvement and resources area was found in the results from surveys given to staff and in conversations and documents from the facility and partnering agencies.

Conducting the Audit Step 2: Analyzing the Data

After completing the data collection tool, it was analyzed during the second step in the process. This part of the process started by looking at the data collected in Whole-Youth Achievement for any disparities in achievement among subgroups. Using the data collection tool, Table 4 was created to compare credits earned (academic achievement), risk factors, major behavior referrals, and rate of return disaggregated by race and ethnicity.

Table 4

Key Data Disaggregated by Race and Ethnicity

Race and Ethnicity	% Of All Youth	% Of All Credit Earners	% Of All Major Behavior Referrals	% Of All High Risk Indicators	% Of All Multiple Intakes
African American/Black	63.43	67.03	75	66.67	62.86
Hispanic/Latinx	8.58	6.59	0	0	11.43
White	14.55	14.29	25	33.33	14.29
Asian	< 1	2.20	0	0	2.86
Other/ Multiracial	12.69	9.89	0	0	8.57

The data observed on Table 4 points to a potential area of concern being in major behavior referrals. Both African American/Black and White youth are disproportionately represented as the only two subgroups receiving major behavior referrals and at a rate greater than 10% of their representation of all youth.

These same data categories were reviewed for students in the gender, disability, and limited English proficiency subgroups. Table 5 shows that academically female, disabled, and LEP youth underperformed their male, non-disabled, and native English-speaking peers.

Table 5

Key Data Disaggregated by Gender, Disability, and Limited English Proficiency (LEP)

	% Of All Youth	% Of All Credit Earners	% Of All Major Behavior Referrals	% Of All High Risk Indicators	% Of All Multiple Intakes
Female Youth	23.88	5.88	8.33	N/A	2.71
Youth with Disabilities	28.36	10.50	16.67	N/A	5.81
Youth with LEP	11.19	4.20	8.33	N/A	2.33

Table 5 also shows a disproportionate relationship when compared with the percentage of the overall youth population that the subgroups make up. This, however, is not true for the areas of major behavior referrals and multiple intakes, or rate of return. For these two areas the percentage of female youth, youth with disabilities, and youth with LEP is lower than their percentage of the entire youth population at the facility.

The team noted the disproportionalities for race and ethnicity in the behavior referrals and the for the number of female youths, youth with disabilities, and youth Limited English Proficiency earning credits, and then analyzed the data further prior to presenting it to the larger team. First, behavior management programming data was analyzed to dig deeper into the number

of major behavior referrals. Fidelity data included on the data collection tool indicates that the Facility-Wide Positive Behavior Interventions and Supports (FW-PBIS) tiers were all scored below what is considered “implementing with fidelity.”

Next, the team brought in more data for academic achievement in for female youth, youth with disabilities, and youth with LEP. Table 6 shows the percentage of students in each of the three subgroups who completed math and reading objectives, which are an indicator that learning, and skill building occurred for those students.

Table 6

Students Completing Objectives Disaggregated by Gender, Disability, and LEP

	% Of all students completed objectives	% Of all students completed math objectives	% Of all students completed reading objectives
Female Youth	18.70	14.63	16.26
Youth with Disabilities	26.02	21.95	21.95
Youth with LEP	10.57	8.94	8.13

Academic achievement data from objectives agreed with the data analyzed from credits, with all three subgroups being underrepresented in those youth who completed objectives. This information agrees with the data in Table 5 which had shown the percentages of credit earning youth. Educational programming data on type of instruction, in-person and online, did not provide any useful information in this situation, as no credits were earned in by youth in their online courses. Further, courses with online instruction accounted for less than 10% (6.72%) of all classes, which was deemed by the team to not be a statistically significant amount.

Conducting the Audit Step 3: Presenting the Data

In preparation for step three, the team used the collected data to start the *Improvement Planning Tool*, which is a facility tool used to organize data, needs or gaps between the current

status and the desired goals. Figure 7 shows this preparation with the team identifying two of the current issues found during analysis of the data, the desired goal, and at least one of the causes of the gap.

During the meeting when the team presented the data, the improvement planning tool was utilized as the agenda that guided the meeting. The team was able to present the data and lead the meeting through the six areas of the planning tool. The presentation started with an explanation of the current outcomes and desired outcomes supported by the data. This was followed by what the team determined as possible sources of the inequities. They were then able to open a dialogue with the larger team to gather more insight into what possible causes might have been. This led to deeper insights that were not captured by the available data collected and analyzed by the team. For example, from the dialogue it became clear that not all staff were entering major behavior referrals into the data management system. It was also brought up that the female unit and the unit with the highest concentration of younger and lower-functioning youth were the most likely to not be in programming, like school, due to low-staffing.

Based on the dialogue the decision was made to rank the inequities in academic achievement by female youth, youth with disabilities, and youth with limited English proficiency. This led to a dialogue brainstorming potential solution to the two problems. The team used this time to make notes that would contribute to step four and step five.

Conducting the Audit Step 4: Developing an Action Plan

In order to develop an action plan, a second meeting was scheduled with a selection of members from the larger team. This meeting again used the Improvement Planning Tool, however focused solely on solutions/action steps and evaluation items. The meeting started by reviewing the brainstorming notes from the previous meeting, while allowing for additional ideas

Figure 7

Improvement Planning Tool – FW-Equity Audit

**Improvement Planning Tool
FW-Equity Audit for Waalkes Fall 2022**

Current Outcomes: How things are...	Desired Outcomes: How things should be...	Needs or Gaps: What is the source of the problem?	Priority Ranking: How important is this need compared to others?	Solutions/Action Steps: What are we going to do about it?	Evaluation Items: How do we know we've succeeded?
African American/Black and White students are receiving a disproportionately high number of major behavior referrals compared to the rest of the youth.	All students are represented equitably in the number of major behavior referrals.	1. The current PBIS is not being implemented with fidelity by staff. 2. Not all staff document referrals when they happen.			
Female students, students with disabilities, and LEP students are not equitably represented as students who earn credits.	All students are represented equitably in the number of students who are earning credits.	1. Students in these subgroups are not learning skills at the same rate of other subgroups. 2. Students in these subgroups miss more programming.			

to be added and previous ideas to be clarified. Additional data was also provided during this time to support the proposed solutions/action steps. Once all the ideas were on the table, the team went through the process of deciding which actions steps with evaluation items would be most effective in the pursuit of equity.

Conducting the Audit Step 5: Evaluating and Monitoring

For the final step in the equity audit process, the team created a calendar to monitor the progress of the plan established in step four. The plan is to monitor the evaluation items for each action step at the end of each academic term. Figure 8 shows the calendar for the remainder of the 2022-2023 school year into the 2023-2024 school year.

Figure 8

Improvement Plan Monitoring Calendar

Month	Actions
November	<ul style="list-style-type: none"> • Begin implementing the identified action steps.
December	<ul style="list-style-type: none"> • Check-in with staff during supervision meeting for understanding, as needed.
January	<ul style="list-style-type: none"> • Review action steps with all staff during team meetings. • Check-in with staff during supervision meetings for understanding, as needed.
February	<ul style="list-style-type: none"> • Start to prepare data for monitoring of action steps. • Gather feedback and input from staff and stakeholders.
March	<ul style="list-style-type: none"> • Meet to review progress being made on action steps. • Report an update to all staff and stakeholders.
April	<ul style="list-style-type: none"> • Review action steps with all staff during team meetings. • Check-in with staff during supervision meetings.
May	<ul style="list-style-type: none"> • Check-in with staff during supervision meetings.
June	<ul style="list-style-type: none"> • Start to prepare data for monitoring of action steps. • Gather feedback and input from staff and stakeholders.
July	<ul style="list-style-type: none"> • Meet to review progress being made on action steps. • Report an update to all staff and stakeholders.
August	<ul style="list-style-type: none"> • Review action steps with all staff during team meetings. • Check-in with staff during supervision meetings for understanding, as needed.
September	<ul style="list-style-type: none"> • Meet to review progress being made on action steps. • Report an update to all staff and stakeholders.
October	<ul style="list-style-type: none"> • Begin data collection and planning for next FW-Equity Audit.

The calendar in Figure 8 includes the facilities plan to routinely review and check in with staff and stakeholders during the completion of the action steps leading into the new FW-Equity Audit the following year.

Section VI: Evaluating the Equity Audit Process and Developed Framework

This final section of my project provides an evaluation of the initial implementation of the Facility Wide – Equity Audit process developed using the new Facility Wide – Equity Audit Framework developed in this project. The evaluation will start by addressing the limitations of the project and the effect on the project as a whole.

Limitations

In late October 2022, the Kent County Juvenile Detention Center hired a new Superintendent, who had currently held the position as the Residential Programming Director. This placed a number of limitations on the project, first being that the new Superintendent had been one of the FW-Equity Audit Team members. However, due to continuing to perform his previous role along with the new role, the individual did not have the availability to actively participate. The change in leadership also saw the departure of the Detention Programming Director, who was also a FW-Equity Audit Team member, which left the FW-Equity Audit Team with only two members from the school. The further effects the changes had on general morale made eliminated the possibility of adding new members from to the team from the facility. Without this representation from the facility, certain data were unavailable through the process, narrowing the scope of the audit.

Evaluation

In order to guide an evaluation of the overall FW-Equity Audit implemented for during this project, I created a fidelity tool. This tool was adapted heavily from the FW-PBIS TFI,

which the school uses to evaluate the implementation of FW-PBIS (Jolivette et al., 2017). The fidelity tool created for the purpose of guiding this section is divided into three main areas: (a) teams; (b) process; and (c) evaluation, and uses the formatting and scoring criteria system of zero to two, similar to that of the FW-PBIS TFI, with anything below a 70% indicating a need for improvement in implementation. Table 7 shows the score for each area as well as the overall score based on the completion of the tool by the FW-Equity Audit team (see the full tool in Appendix D).

Table 7

FW-Equity Audit Fidelity Tool Scores

	Score	Fraction	Percent
Team	1	1/4	25.0
Process	6	6/8	75.0
Evaluation	5	5/6	83.3
Overall	12	12/18	66.7

Table 7 shows that the largest area in need of improvement was Teams, which is in large part due to the disruption to the FW-Equity Audit described in the previous section. Further, the other two areas, process and evaluation, were both scored above the 70% threshold set; however, both scores were impacted by the fidelity evaluation happening shortly after the completion of the audit. By not completing the evaluation closer to the implementation of the next audit, there was not time for monitoring and communication to be implemented.

Recommendations for Future Audits Using the New Tool

The recommendations in this section have been made based on the experience of completing this initial audit and the evaluation completed in the previous section. The first recommendation is to coordinate with the individuals most involved with databases and information systems to revise data reports to make them more effective during equity audits. For

example, during the project SRSS data had to be disaggregated manually, however connecting with the district representative from the database and a report was able to be created for future audits. Moving forward these conversations will be helpful with the different district and third-party systems used for data.

Another recommendation is aimed at preventing the FW-Equity Audit from being marginalized by the facility and agencies that partner together to provide services to youth. In order to do this, there should be a crosswalk between information used when creating and evaluating partnerships agreements between the facility and other agencies. Using Lighthouse Academy – Waalkes as an example, a crosswalk with the information collected and used for Title 1, Part D program creation, monitoring, and the formal agreement process between the Lighthouse Academy – Waalkes and the Kent County Juvenile Detention Center. This would embed the FW-Equity Audit in with the annual Title 1, Part D planning and support the completion of the audit annually.

A final recommendation is to further the development of a fidelity tool for equity audits. The tool created for the evaluation section was done to help guide the evaluation process, which will be instrumental in the further development of FW-Equity Audits. In part due to the newness of the framework and implementation of equity audits for schools within juvenile justice facilities; but also, for the coordination needed between agencies and programs within juvenile justice facilities. The further development of a fidelity tool to improve the quality of data provided will support the further development and success of FW-Equity Audits.

Closure

In closing, I want to reiterate that to my knowledge, until I conducted this work, no equity tool for use within schools with restrictive environments, such as schools within a juvenile

justice system, did not exist, or if it existed, it was not found via my extensive search. Given this situation, I reviewed the literature to find existing equity audits for use in regular school settings, and used my knowledge as a practitioner to create one for schools within restrictive environments, adapting, adding, and deleting as needed.

To test out this tool, I adapted the recommended audit preparation steps, and then conducted an actual audit using this new tool. Further, even though it was outside the scope of the proposed project, I adapted a fidelity tool for the equity audit process to support my evaluation of the equity audit process. Overall, despite some limitations, new knowledge was acquired for this organization, and most importantly, a new equity audit tool now exists for schools in similar situations. Students in such environments desire nothing less.

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Appendix A

School Leader Support Letter

SCHOOL PERMISSION TO CONDUCT SPECIALIST PROJECT

June 10, 2022

Dear Institutional Review Board:

The purpose of this letter is to inform you that I give Matthew Milanowski, an employee of my organization, permission to conduct the project titled Equity Audits for Schools in Juvenile Justice Facilities at Lighthouse Academy Waalkes. He will be using deidentified student group data, as well as looking at policies, procedures, and practices in place as he conducts an equity audit.

This also serves as assurance that this school complies with requirements of the Family Educational Rights and Privacy Act (FERPA) and the Protection of Pupil Rights Amendment (PPRA) (see back for specific requirements) and will ensure that these requirements are followed in the conduct of this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi Cate", with a stylized flourish at the end.

Dr. Heidi Cate
Superintendent

The right of a parent of a student to inspect, upon the request of the parent, a survey created by a third party before the survey is administered or distributed by a school to a student. Any applicable procedures for granting a request by a parent for reasonable access to such survey within a reasonable period of time after the request is received.

- Arrangements to protect student privacy that are provided by the agency in the event of the administration or distribution of a survey to a student containing one or more of the following items (including the right of a parent of a student to inspect, upon the request of the parent, any survey containing one or more of such items): Political affiliations or beliefs of the student or the student's parent. Mental or psychological problems of the student or the student's family. Sex behavior or attitudes. Illegal, anti-social, self-incriminating, or demeaning behavior. Critical appraisals of other individuals with whom respondents have close family relationships. Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers. Religious practices, affiliations, or beliefs of the student or the student's parent. Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

The right of a parent of a student to inspect, upon the request of the parent, any instructional material used as part of the educational curriculum for the student. Any applicable procedures for granting a request by a parent for reasonable access to instructional material received.

- The administration of physical examinations or screenings that the school or agency may administer to a student.

The collection, disclosure, or use of personal information collected from students for the purpose of marketing or for selling that information (or otherwise providing that information to others for that purpose), including arrangements to protect student privacy that are provided by the agency in the event of such collection, disclosure, or use.

The right of a parent of a student to inspect, upon the request of the parent, any instrument used in the collection of personal information before the instrument is administered or distributed to a student. Any applicable procedures for granting a request by a parent for reasonable access to such instrument within a reasonable period of time after the request is received.

Appendix B

HSIRB Letter

IRB-2022-223 - Initial: WMU IRB Oversight Not Required do-not-

reply@cayuse.com <do-not-reply@cayuse.com>

Mon 6/27/2022 4:12 PM

To: Louann A Bierlein Palmer <l.bierleinpalmer@wmich.edu>; Matthew P Milanowski
<matthew.p.milanowski@wmich.edu>

Attention: This email is from outside Western Michigan University. Use caution when opening links and attachments.

WESTERN MICHIGAN UNIVERSITY



Human Subjects Institutional Review Board

June 21, 2022

To: Louann Bierlein Palmer, Principal Investigator

Re: Initial - IRB-2022-223

Equity Audits for Schools in Juvenile Justice Facilities

This letter will serve as confirmation that your research project titled "Equity Audits for Schools in Juvenile Justice Facilities" has been reviewed by the Western Michigan University Institutional Review Board (WMU IRB).

Based on that review, the IRB has determined that approval is not required for you to conduct this project because you are not collecting personal identifiable (private) information about an individual.

The Board wishes you success in the pursuit of your research

goals. Sincerely,

Amy Naugle, Ph.D., Chair
WMU IRB

Appendix C

Equity Audit Data Collection Tool

Facility Wide Equity Audit Data Collection and Analysis Tool

Data collection is an instrumental step in conducting any kind of equity audit. For the Facility Wide Equity Audit this tool was adapted from the school equity audit developed by Theoharis & Scanlan (2021) and expanded to include the components Milanowski's Facility Wide Equity Audit framework (2023).

While this tool is intended to be fully completed to implement a fully comprehensive equity audit for a school within a juvenile justice or restrictive setting, data collection can be more targeted to a specific area(s). When determining whether to complete a comprehensive collection of data or a more focused collection of data consider the following questions:

- a) What is the timeline for collecting data?
- b) What is the scope of the audit? What data should be collected?
 - i) Will you do the entire audit? If not, why not? What parts will you focus upon?
Why not other parts? Will you do some parts now and some parts during the next audit?
 - ii) What caused you to choose the data that you did? What reasons or rationale did you use? Why do you think these data are more important and other data are less important?

Once the parameters of the audit have been determined this tool should be completed collaboratively by the equity audit team or a subgroup from the team.

Demographic Profiles

Data collected for the Demographic Profile are intended to be used as a reference point for the data collected at the facility/school level. These data can also be useful when analyzing and creating an action plan for Community Involvement and Resources.

Community Profile	Number	Fraction	Percent
1. Population of the community. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Youth population of community. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Female youth population of community:			
4. Youth labeled with a disability in the community:			
5. Youth labeled as having LEP in the community:			

The data collected for the Facility Profile is intended to be the reference and comparison point for data collected in all other areas of this tool for the equity audit.

Facility Profile	Number	Fraction	Percent
1. All adults working in the facility. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Non-duplicated youth in the facility. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Non-duplicated female youth population in the facility. Disaggregated by ethnicity/race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Non-duplicated youth labeled with a disability in the facility. Disaggregated by ethnicity/race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
5. Non-duplicated youth labeled as having LEP in the facility. Disaggregated by ethnicity/race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

Staff Quality Indicators

The data collected in this section will inform the Equity Audit Team on the quality of the staff at the facility. Tables are organized and aligned with the four (4) indicators for the Staff Quality component of Milanowski's Facility Wide Equity Audit Framework.

1. Experience	Number	Fraction	Percent
1. Staff with 0-5 years. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Staff with 6-10 years. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Staff with 11-15 years. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Staff with 15 or more. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

2. Staff Education High Degree Earned	Number	Fraction	Percent
1. Having a high school diploma. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Having a GED. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Having a Bachelor's Degree. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Having a Masters' Degree or Higher. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
5. Having another degree/credential. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

3. Professional Development/Training	Yes	No	N/A
1. Does a training calendar exist for all staff members?			
2. Do trainings meet local, State, and Federal requirements for staff training?			
3. Are there opportunities for all staff to participate in professional development in their field?			
4. Is there an onboarding plan for new staff members?			
5. Are there professional coaching/mentoring opportunities available to all staff members?			

4. Staff Satisfaction - Survey Results	Yes	No	N/A
1. Are staff satisfied with their role at the facility?			
2. Do staff feel supported in their role at the facility?			
3. Are staff considering leaving the facility for another job?			
4. Are staff satisfied with the work environment at the facility?			
5. Do staff feel safe while working at the facility?			

4. Staff Satisfaction - Retention	Number	Fraction	Percent
1. How many staff were terminated or quit?			
2. How many staff retired?			
3. How many staff were hired during the past 12 months?			

Program Quality Indicators

The data collected in this section will inform the Equity Audit Team on the quality of the programs at the facility. Tables are organized and aligned with the four (4) indicators for the Program Quality component of Milanowski's Facility Wide Equity Audit Framework.

1. Youth Grouping/Housing – Detention (Non-duplicate)	Number	Fraction	Percent
1. Total youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Female youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths labeled with disabilities. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths labeled having LEP. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

1. Youth Grouping/Housing – Residential	Number	Fraction	Percent
1. Total youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Female youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths labeled with disabilities. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths labeled having LEP. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

2. Educational Programming – Traditional Instruction	Number	Fraction	Percent
1. Total youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Female youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths labeled with disabilities. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths labeled having LEP. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

2. Educational Programming – Online Instruction	Number	Fraction	Percent
1. Total youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Female youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths labeled with disabilities. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths labeled having LEP. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

3. Health and Wellness	Description
1. Are all youth able to access medical care when needed/necessary while at the facility? How?	
2. Are all youth able to access mental health care/counseling when needed/necessary while at the facility? How?	
3. Are all youth provided with food each day while at the facility?	
4. Are there opportunities for all youth to get physical activity and/or exercise daily while at the facility?	

4. Behavior Management – FW-PBIS	Number	Fraction	Percent
1. FW-PBIS Tiered Fidelity Inventory Total Score:			
<i>Tier I:</i>			
<i>Tier II:</i>			
<i>Tier III:</i>			
2. Youth moved from Tier I to Tier II/III. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youth moved from Tier II/III to Tier I. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths with major behavior referrals. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

Whole-Youth Achievement Indicators

The data collected in this section will inform the Equity Audit Team for the whole-youth achievement at the facility. Tables are organized and aligned with the four (4) indicators for the Whole-Youth Achievement component of Milanowski's Facility Wide Equity Audit Framework.

1. Academic Achievement – Credits	Number	Fraction	Percent
1. Earned by all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Youth who earned credits. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Credits earned in traditional courses by all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Credits earned in online courses by all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

1. Academic Achievement – Growth & Skills	Number	Fraction	Percent
1. Youths who made positive change in math. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Youths who made positive change in reading. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Math objectives completed by all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Reading objectives completed by all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

2. Risk Factors – SRSS Results	Number	Fraction	Percent
1. Youths with total indicators in the “low” range. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Youths with total indicators in the “moderate” range. Disaggregated by race:			
<i>African American/Black</i>			

<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths with total indicators in the “high” range. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

3. Behavior Referrals – Total Major Referrals	Number	Fraction	Percent
1. Total referrals for all youth. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Total referrals for female youths. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Total referrals for youths labeled with disabilities. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Total referrals for youths labeled having LEP. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

4. Rate of Return – Duplicate Student Count	Number	Fraction	Percent
1. Youth with more than 1 intake. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
2. Female youths with more than 1 intake. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
3. Youths labeled with disabilities with more than 1 intake. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			
4. Youths labeled having LEP with more than 1 intake. Disaggregated by race:			
<i>African American/Black</i>			
<i>Hispanic/Latinx</i>			
<i>White</i>			
<i>Asian</i>			
<i>Native American or Alaska Native</i>			
<i>Native Hawaiian or Other Pacific Island</i>			
<i>Other/Multiracial</i>			

Community Involvement and Resources Indicators

The data collected in this section will inform the Equity Audit Team on community involvement and resources at the facility. Tables are organized and aligned with the four (4) indicators for the Community Involvement and Resources component of Milanowski's Facility Wide Equity Audit Framework.

1. Asset Mapping	Number	Fraction	Percent
1. Does a map of available resources in the community exist for youth when they leave the facility?			
2. How many points are included in each of the following categories:			
<i>Housing/Shelter (i.e., low-income housing, homeless shelter)</i>			
<i>Health Centers (i.e., hospitals, urgent care, dentist, vision)</i>			
<i>Mental Health Resource Centers (i.e., community mental health offices)</i>			
<i>Food (i.e., grocery stores, restaurants, food pantries)</i>			
<i>Transportation</i>			
<i>Employment Centers</i>			
<i>Education (i.e., GED Center, HSC Centers, Community Colleges)</i>			
<i>Recreational Centers (i.e., YMCA/YWCA, gyms, parks)</i>			
<i>Religious Centers (i.e., Churches, Masques, Temples)</i>			
<i>Other</i>			
3. How many times has the asset map been updated during the past 12 months?			
4. Is the asset map available online and easy to access for all former residents of the facility?			

3. Community Agency Programming	Description
1. How many different individuals/agencies provide special programming? List:	

3. Transition Planning	Number	Fraction	Percent
1. Do all youth have plans for successful returning to the community when they are released?			
2. How many youths enroll in a HSC, GED, or Post-Secondary school within 30 days of being released?			
3. How many youths have a job within 30 days of being released?			
4. How many youths completed an Educational Development Plan while at the facility?			
5. How many youths had access to job/career skill building while at the facility?			

Reference:

Theoharis, G. & ScanlanM. (2021). Leadership for increasingly diverse schools. 2nd ed., Routledge. pp. 273-287

Appendix D

FW-Equity Audit Fidelity Tool

Facility Wide – Equity Audit Fidelity Tool

The purpose of this fidelity tool is to provide a reliable and efficient measure of the extent to which the Equity Audit Team has completed the planning and implementation for a Facility-Wide – Equity Audit. The tool is divided into three sections: 1) Team; 2) Process; and 3) Process Evaluation. Each section can be used separately or in combination depending on the scope of information desired.

The Facility Wide – Equity Audit Fidelity Tool is based on Milanowski's Facility Wide – Equity Audit Framework for juvenile justice (and other) restrictive settings. This framework seeks input from all stakeholders and data all agency sources involved in the day-to-day operations and programming for the facility. This instrument was adapted from the FWPBIS FTI by incorporating the components and areas in Milanowski's Facility Wide – Equity Audit Framework. This fidelity tool may be used a) for initial assessment to determine what a facility needs to conduct an equity audit and what it already has in place, b) as a guide for implementation of a Facility Wide – Equity Audit, and c) as an index of sustained Facility Wide – Equity Audit implementation.

Completion of the Facility Wide – Equity Audit Fidelity Tool produces scale and item scores that indicate the extent to which the core features of the equity audit process were implemented. It is up to the facility and agencies involved to determine what score range is accepted as a level of implementation that will result in improved equity outcomes from the equity audit process.

Intended Participants and Schedule of Administration

The Facility Wide – Equity Audit Fidelity Tool is completed by the multi-disciplinary leadership team that includes representation from the facility and other agencies involved in the day-to-day operations and programming for youth in the facility. It is recommended that this also include members involved in implementing the Facility Wide – Equity Audit and should be done after every audit is conducted.

The completion of this instrument should result in a) an action plan for improvement, b) celebration, and c) sustainability.

Outcomes

Criteria for scoring each item of the Facility Wide – Equity Audit Fidelity Tool reflect degrees of implementation (0 = Not implement; 1 = Partially implemented, 2 = Fully implemented) of Team, Process, and Process Evaluation. A complete administration of the instrument produces three scale scores: Percentage of implementation for Team, Percentage of implementation for Process, and Percentage of implementation for Process Evaluation, as well as item scores for each area. The item reports are produced to guide facility and agency – level support and team action planning.

Facility Wide – Equity Audit Fidelity Tool - Team

Feature	Possible Data Source	Scoring Criteria
FW-Equity Audit Team		
1.1 Team Composition FW-Equity Audit Team includes 3 to 5 individuals representing the various agencies and programs operating within a facility; as well as including a demographic representation similar to that of the youth population.	<ul style="list-style-type: none"> • Facility organization chart • FW-Equity Audit team meeting minutes with attendance roster • FW-Equity Audit action plans 	0 = FW-Equity Audit team does not exist OR does not include a representative from all facility agencies/programs 1 = FW-Equity Audit team exists but does not included a representative from all agencies/programs OR attendance of these members is below 80% 2 = FW-Equity Audit team exists with representation from all agencies/programs and matches the demographic make up of the youth population at the facility
1.2 Team Operating Procedures FW-Equity Audit Team should have (a) regular meeting format/agenda, (b) minutes, and (c) a current action plan (updated at each meeting)	<ul style="list-style-type: none"> • FW-Equity Audit team meeting agendas and minutes • FW-Equity Audit action plans • Email correspondence with facility DEI team leader 	0 = FW-Equity Audit team does not use regular meeting format/agenda, and minutes OR have a current action plan 1 = FW-Equity Audit team has at least 2 of (a) -(c) 2 = FW-Equity Audit team meets at least once every 3 months AND uses regular meeting format/agenda, minutes AND has a current action plan

Facility Wide – Equity Audit Fidelity Tool – Process

Feature	Possible Data Source	Scoring Criteria
FW-Equity Audit Process		
2.1 Data Collection FW-Equity Audit Data Collection Tool has been created/reviewed and includes data collected in (a) staff quality; (b) program quality; (c) whole-youth achievement; and (d) community involvement and resources	<ul style="list-style-type: none"> FW-Equity Audit team meeting minutes FW-Equity Audit data collection tool 	0 = FW-Equity Audit Data Collection Tool does not exist OR exists without any of (a) - (d) 1 = FW-Equity Audit Data Collection Tool has at least 2 of (a) - (d) 2 = FW-Equity Audit process exists AND includes all of (a) – (d).
2.2 Data Analysis FW-Equity Audit Data Analysis includes the use of a protocol that involves the FW-Equity Audit Team.	<ul style="list-style-type: none"> FW-Equity Audit team meeting agendas and minutes Data analysis protocol 	0 = FW-Equity Audit Data Analysis protocol involving the team does not exist 1 = FW-Equity Audit data analysis occurred, but did not involve the use of a protocol OR did not involve the team 2 = FW-Equity Audit data analyze occurs AND is analyzed using a protocol by the FW-Equity Audit team and others.
2.3 Action Plan FW-Equity Audit action plan includes actions to be completed by (a) identified individual(s)/group(s), (b) based on identified inequities in the data collected, and (c)	<ul style="list-style-type: none"> FW-Equity Audit team meeting minutes Action plan template used by team Completed action plan by team 	0 = FW-Equity Audit action plan does not exist OR does not include any of (a) – (c) 1 = FW-Equity Audit action plan has at least 1 of (a) – (c)

has an identified Evaluation Item.		2 = FW-Equity Audit action plan is completed and includes all of (a) – (c)
2.4 Monitoring FW-Equity Audit action plan is reviewed and updated at regularly held FW-Equity Audit Team meetings and updates shared with all stakeholders.	<ul style="list-style-type: none"> • FW-Equity Audit team meeting minutes • Action plan updated by team 	0 = FW-Equity Audit action plan is not monitored once completed and is not updated regularly during team meetings 1 = FW-Equity Audit monitoring occurs BUT the action plan is not updated 2 = FW-Equity Audit monitoring occurs and the action plan is updated

Facility Wide – Equity Audit Fidelity Tool – Process Evaluation

Feature	Possible Data Source	Scoring Criteria
FW-Equity Audit Process Evaluation		
3.1 Evaluation The FW-Equity Audit process and outcomes are reviewed and analyzed annually (typically prior to the next equity audit is facilitated) in order to adjust and improvements to the process.	<ul style="list-style-type: none"> FW-Equity Audit team meeting minutes 	0 = FW-Equity Audit process and outcomes are not reviewed and analyzed 1 = FW-Equity Audit process is reviewed and analyzed OR outcomes are reviewed and analyzed 2 = FW-Equity Audit process and outcomes are reviewed and analyzed
3.2 Communication with Stakeholders Regular communication with stakeholders includes (a) FW-Equity Audit results; (b) action plan monitoring updates; (c) process evaluation; and (d) FW-Equity Audit Fidelity Tool results	<ul style="list-style-type: none"> Newsletters sent to stakeholders Stakeholder meeting minutes 	0 = Regular communication with stakeholders does not occur OR does not include any of (a) – (d) 1 = Regular communication with stakeholders occurs AND includes at least 2 of (a) – (d) 2 = Regular communication with stakeholders occurs and includes all of (a) – (d)
3.3 Fidelity Data FW-Equity Audit team reviews and uses FW-Equity Audit fidelity data for action planning at least annually	<ul style="list-style-type: none"> FW-Equity Audit team meeting agendas and minutes Completed FW-Equity Audit fidelity tool 	0 = No FW-Equity Audit fidelity data are collected 1 = FW-Equity Audit fidelity data are collected informally and/or less often than annually 2 = FW-Equity Audit fidelity data collected AND used for

		decision-making at the time it is collected by the FW-Equity Audit team
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References

Jolivet, K., Swoszowski, N. C., & Ennis, R. P. (2017). *Facility-wide PBIS tiered fidelity inventory*. OSEP Technical Assistance Center on Positive Behavioral Interventions and Support. www.pbis.org