



Steven L. Beshear
Governor

Terry Holliday, Ph.D.
Commissioner of Education

**EDUCATION AND WORKFORCE DEVELOPMENT CABINET
DEPARTMENT OF EDUCATION**

Capital Plaza Tower • 500 Mero Street • Frankfort Kentucky 40601
Phone: (502) 564-4770 • www.education.ky.gov

November 13, 2014

Via Email & US Mail

Mr. Wendell Back, Chair
Menifee County Board of Education
P.O. Box 110, 202 Back Street
Frenchburg, KY 40322

Mr. Benny Patrick, Interim Superintendent
Menifee County School District
P.O. Box 110, 202 Back Street
Frenchburg, KY 40322

RE: Management Audit of Menifee County School District

Dear Board Chair Back and Interim Superintendent Patrick:

As you are aware, the Kentucky Department of Education (KDE) has been conducting a management audit of Menifee County school district, pursuant to KRS 158.780, KRS 158.785 and 703 KAR 3:205.

This management audit has concluded. A copy of the final report is attached, along with the transmittal letter to the chair of the Kentucky Board of Education (KBE).

Based upon the findings outlined in this report, it is clear that a pattern of significant lack of efficiency and effectiveness in the governance and administration of the school district exists in multiple areas; however, it also appears that the local board is supportive of improvement and wants to adequately address such concerns. Accordingly, in my official capacity as the chief state school officer, I have recommended to the KBE that the Menifee County school district should be designated a "state-assisted" district.

Please note that, pursuant to KRS 158.785(6), a designation of "state-assisted" means that KDE shall help the local district develop and implement a plan to correct the deficiencies identified. KDE shall also monitor compliance with this plan. If the plan is not being adequately developed or implemented, I may choose to move forward with a recommendation of "state-managed" to the KBE in the future.

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Management Audit of Meniffee County School District

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A local school district recommended by the commissioner to be state-managed or state-assisted has the right to appeal this recommendation to the Kentucky Board of Education (KBE). The district has the right to a full evidentiary hearing, administered by a hearing officer, before the KBE. The commissioner's recommendation will be accompanied by the KRS 13B.050 notice of administrative hearing. This notice shall set a date for a prehearing conference to be held by the hearing officer. Prior to the prehearing conference date, the local board of education needs to meet in a public meeting to determine whether or not the board wants to participate in a full evidentiary hearing before the KBE to contest the commissioner's recommendation. If the board does want to pursue an appeal before the KBE to contest the commissioner's recommendation by participating in a hearing before the KBE, the board needs to vote in open session of the public meeting to do so. If the board does not want to pursue an appeal before the KBE, does not believe there are genuine issues of material fact requiring a full evidentiary hearing before the KBE to contest the commissioner's recommendation, and does not want to participate in a hearing before the KBE, the board needs to vote in open session of the public meeting to this effect. Board counsel participating in the prehearing conference needs to be prepared to inform the hearing officer whether or not the local board desires a full evidentiary hearing or whether the board believes that it is appropriate for the KBE to rule on the written record without a full evidentiary hearing and without the participation of the board. Board counsel needs to provide the board's written decision on this issue as well at or prior to the prehearing conference to the KDE and the hearing officer.

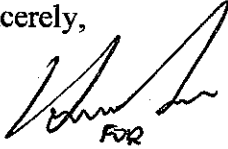
If the board informs the hearing officer at the prehearing conference that it chooses to participate in the KBE hearing and believes a full evidentiary hearing is required, the hearing officer shall set a stand-alone date for the KBE to hold this hearing, to be procedurally administered by the hearing officer, and to hear evidence on the commissioner's recommendation.

If the board informs the hearing officer at the prehearing conference that it chooses not to participate in the KBE hearing and believes a full evidentiary hearing is not required and that it does not believe genuine issues of material fact exist, the hearing officer shall set the hearing to be part of the agenda of a future regularly scheduled KBE meeting. No evidence shall be presented at the KBE meeting, but the KBE shall consider the commissioner's recommendation on the basis of the audit report and the board's written admission that there are no genuine issues of material fact requiring a full evidentiary hearing.

I do not make this important recommendation lightly; however, it is absolutely critical and necessary in order to meet the educational needs of the children in Meniffee County.

If you have any questions, Associate Commissioner Kelly Foster may be reached at (502) 564-5130 and Associate Commissioner Hiren Desai may be reached at (502) 564-1976.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry Holliday', with the word 'FOR' written in small capital letters directly beneath it.

Terry Holliday, Ph.D.

Cc: Mr. Justin Lane, Meniffee County Board Member
Ms. April Smith, Meniffee County Board Member
Mr. Bennie Deskins, Meniffee County Board Member
Ms. Leanne Reed, Meniffee County Board Member
Mr. Roger Marcum, Chair, Kentucky Board of Education
KDE Associate Commissioners

Attachments

Steven L. Beshear
Governor



Terry Holliday, Ph.D.
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November 13, 2014

Mr. Roger L. Marcum, Chair
Kentucky Board of Education
500 Mero Street, First Floor
Frankfort, KY 40601

RE: 2014 Management Audit of Menifee County School District

Dear Chair Marcum:

As you are aware, the Kentucky Department of Education (KDE) has conducted a Management Audit (Audit) of the Menifee County School District in accordance with KRS 158.780, KRS 158.785, and 703 KAR 3:205. This management audit, which I announced in a letter to you, dated August 12, 2014, focused on school and district improvement and reviewed the following areas:

- * Local Governance policies and procedures
- * Curriculum and instructional practices
- * School-Based Decision Making (SBDM)
- * Financial management
- * Personnel practices, including hiring and staffing
- * School food services management

I sent a team of employees from the KDE to the Menifee County School District to conduct the audit. The team was led by Dr. Susan Allred, former Associate Commissioner and current Administrative Coach in my office. Dr. Allred and her team conducted an investigation of the district's compliance with state and federal statutes and administrative regulations and local board policies, which included an on-site review, investigation, and analysis of the governance and administration of the school district in the areas of: a) planning, b) operational support, c) fiscal management, d) personnel administration, and e) instructional management as required by 703 KAR 3:205.

After the conclusion of the Management Audit, which included an on-site visit on September 15-16, 2014, Dr. Allred and her team prepared a Final Management Audit Report ("Report") and an

Executive Summary ("Summary") for my review and consideration. In that Report and Summary, Dr. Allred and her team determined that state assistance is necessary to correct the significant lack of effectiveness and efficiency in multiple areas. I have attached a copy of that Report and Summary.

Using 703 KAR 3:205, Section 2 as a guide, I reviewed the findings and recommendations of Dr. Allred and her team to determine whether there is a significant lack of efficiency and effectiveness in the governance and administration of the Menifee County School District. Based on my review of that Summary and Report, I concluded that while the audit shows some positive aspects of the district, there exists a significant lack of efficiency and effectiveness in governance and administration of the school district, particularly in the areas of planning, operational support, fiscal management, personnel administration, and instructional management. Until the development and deployment of specific processes have been fully implemented throughout the district to correct these issues, I recommend that the Menifee County School District be designated as a state-assisted district.

As grounds for this designation, I am recommending state assistance pursuant to 703 KAR 3:205 as a result of the specific findings included in the Report and Summary, which are summarized specifically below. It is based on these findings that I hereby request an administrative hearing be scheduled as soon as practicable.

SUMMARY OF PERTINENT FINDINGS

(A) **Planning** – Evidence established a failure to develop, adopt and implement planning processes that allow for public review and timely action by the board and administration regarding management of the administrative and business activities of the school district and of the management of the instructional program. See 703 KAR 3:205(2)(2)(a). Of 29 interviewees, 27 spoke to the clear divide in perception of the staff, teachers, assistant principals and community between those who supported the recent superintendent and those who support actions of two specific members of the Menifee County Board of Education. Interviewees characterized as "new staff" shared their palpable fear that jobs are on the line, everyday, based upon which side of the divide an employee is perceived to fall.

(B) **Operational Support** – Evidence established the failure of the district to maintain school building cleanliness and safety including:

(I) A failure to develop and maintain an accurate record of the maintenance needs and expenditures. See 703 KAR 3:205(2)(2)(1)(a). A process is not in place. The district has only one maintenance person. The interim superintendent calls the maintenance person when maintenance concerns are identified. A work order process is not utilized.

(II) A failure to budget and expend funds necessary to maintain the physical plant. See 703 KAR 3:205(2)(2)(1)(b). Menifee Elementary has significant roof issues. Just before school started this year, a large amount of tar entered the building from the roof. Audit team members noted what

appeared to be mold and experienced respiratory discomfort while in the building. Other facilities need significant maintenance/repairs.

The district's bonding potential has been depleted by construction projects, leaving only \$1,130,000 in current bonding potential with the majority of that amount derived from outstanding offers from the School Facilities Construction Commission.

The "Old Botts School" is used primarily for community events. These events are scheduled by a five-member committee comprised of one board member and four community members. Every committee member has a key to the building. The school district owns the building and maintains it, resulting in additional cost to the district for utilities, insurance, and lawn care. Without a school employee present at events, potential insurance claims could be denied.

(III) A failure to employ maintenance and operations staff who provide clean and safe school buildings. See 703 KAR 3:205(2)(2)(1)(c). The district has only one maintenance person.

(IV) A failure to manage a school facility construction program that is in compliance with 702 KAR Chapter 4 and is planned, executed, and completed to ensure that public funds are expended in a responsible manner, including a failure to follow proper bidding requirements and develop and maintain accurate records of expenditures and authorization of expenditures on school construction projects. See 703 KAR 3:205(2)(2)(b)(2)(d). The district prepared a BG form for a capital project. The bidding process was noncompliant. An addendum predates KDE's receipt of the bidding documents, indicating violation of 702 KAR 4:160.

(V) A failure to manage a school facility construction program that is in compliance with 702 KAR Chapter 4 and is planned, executed, and completed to ensure that public funds are expended in a responsible manner, including a failure to institute an administrative oversight process to ensure that facility construction activities are efficient and accountable for both local and state funds. See 703 KAR 3:205(2)(2)(b)(2)(e). The district employed an Architect or Engineer for 7 of 19 capital projects and only one project utilized a Construction Manager.

(VI) A failure to maintain and operate a transportation system, including a failure to develop and implement policies and procedures regarding the use of district-owned vehicles. See 703 KAR 3:205(2)(2)(3)(b). The district's transportation manual needs to be updated from the 2010-2011 school year.

(VII) A failure to maintain and operate a transportation system, including a failure to purchase and maintain equipment to safely and efficiently transport children to school. See 703 KAR 3:205(2)(2)(3)(c). KDE recommends one full-time mechanic to service the district's 23 buses. The district's mechanic performs mechanic work for 6 hours per day and drives a bus for 2 hours per day during the school term. The district does not have a physical bus garage or bus shelter. Instead, the district has a twelve foot by sixteen foot storage shed to house tools. The buses cannot be safely and efficiently maintained with the current arrangement because there is no shelter from the elements and the district does not have a bus lift.

(VIII) Interviewees voiced concerns about the hiring and supervision of the food service staff, and reported that the interim superintendent has made decisions regarding food service staff without informing the food service director or principals. See 703 KAR 3:205(2)(2)(4)(c).

(C) Fiscal management – Evidence established a failure to perform the appropriate planning, budgeting, fund management, and accounting responsibilities required for the fiscal management of the school district, including a failure to assess the need for expenditures. See 703 KAR 3:205(2)(2)(c)(1). Also, see 703 KAR 3:205(2)(2)(c)(2). Menifee County Schools employs two contracted finance staff. They serve as the Finance Officer and Payroll Manager in a neighboring district. They are utilized on an as-needed basis. The contracted finance staff verified all payroll costs in the working budget but did not perform verification of other expenditures, such as occupational therapists, physical therapists, or other contracted special education services, insurance, and workers compensation premiums. Additionally, the Fiscal Year 15 (FY 15) working budget includes \$0 (in either the finance office or the payroll office) for the financial services being performed by the contracted finance employees. Not only is the district obligated to pay for services already rendered during FY 15, the interim superintendent and board chair intend to continue that relationship at least through the end of the calendar year. The FY 15 working budget includes only \$25,000 for legal services for the board despite evidence of previous activity and dramatically higher actual costs. Data regarding average daily attendance and the December 1 child count are not utilized in the budget preparation process. No one interviewed could verify the tax rate utilized in the budgeted revenues included in the working budget. A review of the district budget reflects a significant increase in estimated Medicaid revenue from \$15,000 in the FY 15 tentative budget to \$115,000 in the FY 15 working budget. Only \$23,816 was actually received in FY 14 from this source. Neither the finance officer nor interim superintendent participated in budget development. The FY 15 working budget was developed solely by the contracted finance staff.

The audit team made no findings regarding the maintenance of accurate records of expenditures and authorization of expenditures as required for auditing purposes. See 703 KAR 3:205(2)(2)(c)(3). The interim superintendent receives no information from the finance officer regarding the financial condition of the board or the bank balance.

The board receives financial reports in advance of the board meetings each month: bills paid in the previous month, bills to be paid for the current month, monthly financial report, and balance sheet. No oral presentation is made at the board meetings regarding the financial information. Board members may ask questions during the meetings. There is evidence that the board members do not understand the reports produced by the financial management system (MUNIS) and therefore, requests for off-system schedules are made. Off-system reports are error-prone and may not align with the information contained in MUNIS.

An internal control weakness regarding deposits exists. A single employee is responsible for both taking deposits to the bank and reconciling the bank statement. One of these duties should be reassigned.

There is a significant internal control weakness in the disbursements process. A single employee is responsible for all aspects of the disbursement process, and enters vendors, enters purchase orders, enters invoices, produces checks, and completes the bank reconciliation. Some of these duties need to be assigned to other staff.

There is evidence that the lack of capacity in the finance office has resulted in worker status misclassification. For example, two individuals from a neighboring district are being paid through accounts payable instead of through payroll as Internal Revenue Service guidance would require. Consequently, the individuals are not being given proper service credit through their appropriate state retirement system, nor is the district funding the employer matching retirement contribution.

The audit team made no findings regarding compliance with the purchasing requirements applicable to school districts. See 703 KAR 3:205(2)(2)(c)(4). However, the audit team determined that the district's finance officer did not know whether the district is governed by model procurement or bid law and therefore cannot provide adequate oversight of bidding activities. Local district department heads are responsible for bidding their own purchases, which increases the risk of noncompliance regarding bidding. The district is appropriately utilizing a purchase order system for all purchases except utilities with the interim superintendent's approval on all purchases greater than \$1000. However, there is evidence of management override of internal controls and procedures. For example, instead of following district purchasing procedures, the board chair incurred an expense for board member training, which he paid personally, and for which he subsequently received reimbursement.

Evidence shows that the district has failed to implement investment policies to ensure that all public funds are invested safely and productively. See 703 KAR 3:205(2)(2)(c)(5). The district could not provide the audit team with an investment policy and the district did not bid banking services.

(D) Personnel administration – Evidence established a failure to ensure school district staff are prepared to perform the required professional and staff responsibilities in an effective and efficient manner. See 703 KAR 3:205(2)(2)(d).

(I) Evidence revealed a failure to develop and implement employment practices and procedures that ensure the selection and placement of the most qualified personnel. See 703 KAR 3:205(2)(2)(d)(1). Interviewees indicated that the interim superintendent makes decisions regarding hiring, transferring, and abolishing positions. There is no evidence of a structured system for hiring and transferring employees. There is evidence that individuals have been hired for positions for which they do not possess the qualifications or certifications required.

(II) Evidence revealed a failure to train and evaluate the professional staff of the district as required by applicable laws. See 703 KAR 3:205(2)(2)(d)(2). There was no evidence of finance officer training. There was no evidence of training of the person responsible for human resources. There is not a consistent and transparent process for reviewing positions.

An attendance review was performed by KDE for the 2014-15 school year in September 2014. The review found that school personnel had not been properly trained to administer attendance procedures.

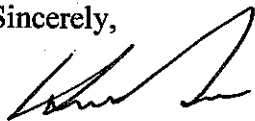
(E) Instructional management – Evidence established a failure to develop and maintain a district-level instructional policy. See 703 KAR 3:205(2)(2)(e).

Evidence established a failure to maintain a curriculum consistent with 703 KAR 4:060 and applicable laws. See 703 KAR 3:205(2)(2)(e)(1). Multiple interviewees indicated there is a lack of monitoring, across the district, regarding the curriculum that is taught in each school, and a lack of knowledge regarding the implementation of new academic standards.

Evidence also established a failure to provide the resources necessary to support the instructional program. See 703 KAR 3:205(2)(2)(e)(2). The audit team found little evidence of a systematic process for using student data to inform curriculum and instruction. Interviewees reported that district leadership meetings with principals have stopped. Interviewees reported that a focus on student achievement has been interrupted. There is not a formal Professional Learning Community (PLC) protocol to drive continuous improvement in teaching and in learning.

Once presented, at the administrative hearing, with the evidence that supports the findings set forth above, it is my belief that the KBE will be encouraged by the positive aspects of the district, but that the KBE also will come to the same conclusion that I have -- that state assistance is necessary to ensure the district has the processes in place to see that all of its students are college- and career-ready. The evidence is very clear that state assistance is required to resolve the significant lack of effectiveness and efficiency in the governance and administration of the Menifee County Schools.

Sincerely,



FOR

Terry Holliday, Ph.D.

Attachments

Cc: Kentucky Board of Education Members
Kentucky Department of Education Planning Committee Members

Management Audit of Menifee County School District

Prepared for

Kentucky Commissioner of Education Terry Holliday

KRS 158.785

Kentucky Department of Education Staff

KRS 158.780 158.785 Management Audit Report: Executive Summary

School District	Menifee County School District	
Superintendent	Benny Patrick, Interim	
Board Chair	Wendell Back	
Date of On-Site Visit	September 15-16, 2014	42 interview sessions; 5 telephone calls; follow-up e-mails; multiple documents cited in the report; approximately 80 people (duplicated count) contacted in the process; review of videotapes of 12 full board meetings from the past year
Management Review Team	Susan Allred, Susan Barkley, Gail Binder, Susan Brock-Greer, Steve Justice, Lucinda McIntosh, Jason Radford, and David Wickersham	
Area of Review	Recommendation	Evidence
Planning	State assistance to correct the significant lack of effectiveness and efficiency in the development, adoption, and implementation of planning processes.	CSIP, CDIP, CEP, board agendas, minutes, board meeting videos, communication regarding decision making through telephone, face-to-face interviews and documentation of decision making. Summarized on pages 3-9.
Operational Support: Food Services, Transportation, Facilities	Although the food services program is compliant as a Community Eligibility Program, district state assistance is needed to provide support for improvement of the overall operational condition of the school district.	Interviews, on site review in schools, required documents. Summarized on pages 9-12.
Operational Support: Financial Management	State assistance to correct the lack of capacity and internal control weaknesses in the financial management system and to provide support to the district to improve the overall financial condition of the school district.	Interviews, relevant documents review, policy review. Summarized on pages 12-17.
Operational Support: Personnel Administration	State assistance to develop and implement effective systems for the hiring, transferring, and training of personnel.	Interviews, relevant documents, job descriptions, review of processes and procedures. Summarized on pages 17-20.
Instructional Management	State assistance to develop and implement effective systems for delivery of curriculum, instruction, and assessment through data use and best practice.	Interviews, relevant documents (pacing guides, Rtl, etc.). Summarized on pages 20-25.

Conclusions: As a result of analysis of all reviewed KDE data, review of publically available findings of outside agencies, a study of trends in the school district in each of the specific categories listed above, and interviews with key leaders and stakeholders, it is the recommendation of the Menifee Management Audit Team pursuant to 158.785 that the Menifee County School District become State-Assisted. Although it is clear that everyone involved wants the best for the Menifee County Schools and is supportive of the school district and its teachers and students, there are three over-riding concerns that are pervasive in the district on which leaders need assistance in knowing how to address and monitor. The three areas are:

- a) Design of a consistent, transparent approach and deployment of personnel hiring, assignment and evaluation compliant with statute and best practice.
- b) Documentation of transparent, consistent design and application of protocol and processes in the district to include but not limited to: finance, professional learning, Response to Intervention, and effective data use.
- c) Design and deployment of an all-inclusive district approach for communication and transparency through leadership training and coaching coordinated by KDE.

Pursuant to 703 KAR 3:205(2)(2), the comprehensive audit included an investigation of the district's compliance with state and federal statutes and administrative regulations and local board policies. Deficiencies identified and established may constitute a pattern of a significant lack of effectiveness and efficiency in the governance and administration of the school district. The comprehensive audit included an on-site review, investigation, and analysis of the governance and administration of the school district, and determined that a significant lack of a pattern of efficiency and effectiveness exists in the following areas [some of the evidence establishing deficiencies appears in bold font]:

- (a) Planning - failure to develop, adopt and implement planning processes that allow for public review and timely action by the board and administration regarding management of the administrative and business activities of the school district and of the management of the instructional program (**board agenda; board meetings (viewed on video); direct communication from interviewees through telephonic and face-to-face interviews; and documentation of decision making; 27 interviewees spoke to the clear divide in perception of the staff, teachers, assistant principals and community between those who supported the recent superintendent and those who support actions of two specific members of the local board of education and the new staff-interviewees who shared their palpable fear that jobs are on the line, everyday, based upon which side of the divide an employee is perceived to fall.**)
- (b) Operational support - failure to provide the operational support services required to operate an efficient and effective school system including:
 - 1. Maintenance and operation of the physical plants - failure of the district to maintain school building cleanliness and safety including:
 - a. Failure to develop and maintain an accurate record of the maintenance needs and expenditures (**Work orders are not utilized.**)
 - b. Failure to budget and expend funds necessary to maintain the physical plant (**Three of the four school buildings appeared on the Kentucky Facilities Information and Classification System (KFICS) report that indicates the 485 worst buildings in the state. The district has failed to maintain or**

replace systems as they age; an inventory file for Meniffee Middle School was not available; the district does not have a physical bus garage or bus shelter.)

- c. Failure to employ maintenance and operations staff who provide clean and safe school buildings. **(The district has one maintenance person.)**
 - d. Failure to make efficient use of personnel as indicated by excessive staffing when compared to school districts of similar size and funding.
 - e. Failure to make repairs that prevent costly and unnecessary maintenance expenditures. **(Significant roof issues exist at Meniffee Elementary; audit teams members noted what appeared to be mold and experienced respiratory discomfort while in the building.)**
 - f. Failure to ensure that existing facilities are adequately insured **(Interviewees indicated that there are no protocols for who has keys to buildings; members of the public have keys to district facilities; the school buildings have been utilized without school staff present as evidenced by school staff repeatedly finding exterior doors unlocked; the "Old Botts School" is used for community events; all five members of the committee that schedules events (one board member and four community members) have a key to the building.)**
2. Facility construction - failure to manage a school facility construction program that is in compliance with 702 KAR Chapter 4 and is planned, executed, and completed to ensure that public funds are expended in a responsible manner including a failure to:
- a. Develop and implement a planning process for identifying the need for new or improved facilities
 - b. Maintain an up-to-date facility survey or ensure that regulatory approvals are secured
 - c. Develop and implement plans to receive the allowable benefit from the School Facilities Construction Commission
 - d. Follow proper bidding requirements and develop and maintain accurate records of expenditures and authorization of expenditures on school construction projects **(The district prepared a BG form for a capital project; the bidding process was noncompliant; an addendum predates KDE's receipt of the bidding documents, indicating violation of 702 KAR 4:160.)**
 - e. Institute an administrative oversight process to ensure that facility construction activities are efficient and accountable for both local and state funds.
3. Maintenance and operation of the transportation system to provide and maintain an efficient transportation system including a failure to:
- a. Provide training for personnel responsible for the safe transportation of children in accordance with Kentucky Board of Education administrative regulations
 - b. Develop and implement policies and procedures regarding the use of district-owned vehicles **(The district's transportation manual needs to be updated from the 2010-2011 school year.)**

- c. Purchase and maintain equipment to safely and efficiently transport children to school **(KDE recommends one full-time mechanic to service the district's 23 buses; the district's mechanic works for 6 hours per day and drives a bus for 2 hours per day during the school term.)**
- d. Establish transportation routes that minimize public expenditure and time children spend en route to school
- e. Follow bidding requirements for the purchase of equipment and materials necessary to conduct the school's transportation program
- 4. School food services - failure to develop an efficient system of school food services including a failure to:
 - a. Develop and maintain an accurate record of school food service expenditures
 - b. Utilize federal and local resources to operate a nutritious program in a cost effective manner
 - c. Employ school food service staff who provide meals in accordance with federal and state guidelines **(Interviewees voiced concerns about the hiring and supervision of the food service staff. Interviewees reported that the interim superintendent has made decisions regarding food service staff without informing the food service director or principals.)**
 - d. Make efficient use of personnel as indicated by excessive staffing when compared to school districts of similar size and funding
- (c) Fiscal management - failure to perform the appropriate planning, budgeting, fund management, and accounting responsibilities required for the fiscal management of the school district including a failure to:
 - 1. Assess the need for expenditures
 - 2. Recommend use of available funds according to an established set of priorities
 - 3. Maintain accurate records of expenditures and authorization of expenditures as required for auditing purposes **(Many of the job duties of the finance officer and payroll clerk are being performed by two staff from a neighboring district; district staff directed questions to these contracted individuals instead of the finance officer; the finance officer was unable to provide basic financial information such as the current bank balance, the number of bonds outstanding, or the months bond payments are due; the finance officer has no education in accounting or finance; the FY 15 working budget has been developed by the contracted finance staff with no participation by the current finance officer; the current finance officer provided no recommendation regarding the tax rate, was unsure what the board would be voting on, and did not prepare any of the information regarding the tax rate options; the FY 15 working budget includes \$0 (in either the finance office or the payroll office) for the financial services being performed by the contracted finance employees; the FY 15 working budget includes only \$25,000 for legal services for the board; data regarding average daily attendance and December 1 child count are not utilized in the budget preparation process; the interim superintendent does not directly communicate any financial information to the board; local district department heads are responsible for bidding their own purchases which increases the risk of noncompliance regarding bidding; the finance officer was**

unsure whether the district had adopted the model procurement code and therefore cannot provide adequate oversight of bidding activities; a sole employee is responsible for all aspects of the disbursement process as follows: enters vendors, enters purchase orders, enters invoices, produces checks, makes deposits, and completes the bank reconciliation; and there is evidence of management override of internal controls and procedures. For example, instead of following district purchasing procedures, the board chair incurred an expense for board member training, which he paid personally, and subsequently received reimbursement.)

4. Comply with purchasing requirements applicable to school districts
5. Implement investment policies to ensure that all public funds are invested safely and productively
- (d) Personnel administration - failure to ensure school district staff are prepared to perform the required professional and staff responsibilities in an effective and efficient manner, including a failure to:
 1. Develop and implement employment practices and procedures that ensure the selection and placement of the most qualified personnel (**Interviewees indicated that the interim superintendent makes decisions regarding hiring, transferring, and abolishing positions; there is no evidence of a structured system for hiring and transferring employees; there is evidence that individuals have been hired for positions for which they do not possess the qualifications or certifications required.**)
 2. Train and evaluate the professional staff of the district as required by applicable laws (**There is no evidence of finance officer training or of the person responsible for human resources; there is not a consistent and transparent process for reviewing positions.**)
- (e) Instructional management - failure to develop and maintain district-level instructional policy including a failure to:
 1. Maintain a curriculum consistent with 703 KAR 4:060 and applicable laws
 2. Provide the resources necessary to support the instructional program (**There is little evidence of a systematic process for using student data to inform curriculum and instruction; interviewees reported that district leadership meetings with principals have stopped; interviewees reported that a focus on student achievement has been interrupted; there is not a formal Professional Learning Community (PLC) protocol to drive continuous improvement in teaching and in learning.**)

Meniffee County Management Audit Report

I. Planning

- a. Team Members: Allred/Wickersham
- b. Persons Interviewed – Face-to-Face: interim superintendent, 3 principals, finance officer, Wolfe Co. support for finance officer team, special education director, supt. secretary/human resources, DAC, 4 board members (3 with attorney), director of transportation/DPP/district health/safe schools/CIITS, DTC/head tech, director of curriculum and instruction with several other responsibilities, food services/federal programs, 6 parents (SBDM, PTO), 3 central office staff with clerical responsibilities
Telephone interviews: 2 former finance employees, 1 board member, 1 parent

Approach: addresses the methods the organization uses to accomplish the work, the appropriateness of the methods to intended outcomes, effectiveness of the methods, and the degree to which the activity is repeatable and is based on reliable data and information.

1. **Who is the leader of the governance and management system?**

Since July 1, 2014, an interim superintendent has been in place in Meniffee County. He was an existing employee in the system who served in the capacity of associate director of the Job Corps responsible for the education side of the program. He has a six month contract as interim. The board is in process of determining how the superintendent search will be conducted. The opening for superintendent occurred with the exit of the former superintendent after a period of litigation and controversy with the board as evidenced by board meetings/actions and the filing of litigation. There is a five-member board of education. Three of the board members have been on the board for two years with two being in the final year of 4-year terms. Of the two in their final year, one is running opposed for re-election and one is not seeking re-election. The board chair is one of the two-year members and had served on the board from 1980-1992.

2. **What documents, policies, and procedures indicate how the schools are governed?**

There is evidence that the Meniffee County Schools has a Comprehensive District Improvement Plan (CDIP); it has a Comprehensive Evaluation Plan (CEP); the district subscribes to the Kentucky School Boards Association's policy service which updates policies; the Meniffee County School Board meets at least monthly and calls special meetings for special topics.

3. **What are the organizational structure and job descriptions of the central office?**

The director of curriculum and instruction has recently coordinated/received a Carol White Physical Education Grant of nearly 1/2 million dollars which requires focus for implementation. As a result of the grant implementation, her office is now in one of the schools. The Director of Pupil Personnel is also Director of Transportation and he frequently drives a bus in the morning and afternoon. Included in his responsibilities is signing off on diplomas issued to Job Corps students. The district assessment coordinator is responsible for the CDIP, is school psychologist, is FRYSC director, and is assisting with the Carol White Physical Education Grant. There is one technology person who is responsible for keeping things running as well as the district level functions. He has a part-time assistant located in one of the schools who also has other job functions. The school food services director also is director of federal programs. The exceptional children's director additionally is responsible for English Language Learners and 504 and is the KECSAC liaison. There is a finance director who has two associates to maintain the work of that office. All three of the finance roles have been filled within the year as this

office has been a focus of instability over the past two years. The superintendent's administrative assistant also serves as the human resources contact for the district.

4. What are the communication structures in the school district?

There is little evidence of the development, adoption, or implementation of a formal, professional, transparent, consistent communication structure in the district at this time. The interim superintendent has not yet established a clear collaborative communication structure for the central office to ensure that all understand roles and responsibilities or made clear expectations of what they will do together to ensure that all students are college-and career-ready. The principals and SBDM councils indicated in interviews a disconnection between what is going on at the central office, activities of the board of education, and the needs of the students and schools. The district has computers, e-mail, (until July) posts board meeting videos, posts board agendas ten days in advance of meetings, has a one-call service and maintains a website. E-mail evidence indicates often apparent random actions that are reactionary.

For example, there are evidences of reprimands through e-mail without discussion, letters appointing people to positions which changed several times without discussion, after the fact certification actions to support a person already chosen for the position, and SBDM council interviewing for a position that had been posted, offering the position and then being told it could not be filled. As late as September 25, review team members received documentation of the transfer of a teacher assistant from the building without advance consultation of the principal of the school. Another example is an e-mail from the interim superintendent to principals on September 22 indicating they are no longer to send e-mails to board members while a chain of command is developed. Much of the communication within central office is informal based on what the issue-of-the-day is. Due to the lack of structure within the central office, the schools often are left out of the process. For example, a person showing up to the school as a new employee for the district without consultation on the selection of the person serving a vital role (Gifted Education) is reportedly not unusual.

5. What is the relationship between the central office and the local board of education?

The interim superintendent has a clear connection to the board chair with apparent support from the other four members of the board. With the interim superintendent only in place since July, it is difficult to know how effective this relationship will be moving forward. With the exception of key directors, much of the central office staff is inexperienced and expressed the need for training to be able to carry out their functions. Training needs were expressed by the interim superintendent, all staff of the finance office and the person responsible for human resources. Of a total of 29 people interviewed across the two-day intensive visit in Menifee by the team for this portion of the report, 27 spoke to the clear divide in perception of the staff, teachers, assistants principals and community between those who support the recent superintendent and those who support actions of two specific members of the board of education and what is characterized as new staff. Interviewees shared their palpable fear that jobs are on the line, everyday, based upon which side of the divide an employee is perceived to fall. Prior to the on-site audit visit, interviewers reviewed videos of board meetings posted on the district's website [a practice that has been discontinued] depicting this same mistrust and fear evidenced by the interaction between board members and staff as well as the public. A parent also shared with interviewers his experience at one of the board meetings and events that followed perceived as retribution for his actions.

The discontinuation of the videotaping and prior posting of board meeting agendas (Sept. 18 changes) conflicts with the district's obligation to provide for public review of the actions of the board and the administration, and also conflicts with Goal two of the Menifee Comprehensive District Improvement

Plan: Continue to provide transparency and increase effectiveness in the operations of our school district. Strategy 1: Transparency; Strategy 2: Culture.

An e-mail from the board vice chair to the audit chair (Sept. 19) expressed concern about proceedings and changes in process at the board meeting (Sept. 18) include no longer taping the board meetings and removing items from the agenda with no prior notice occurring at the September 18 meeting. The e-mail expressed that the reason for sending the e-mail was to "help paint this very disturbing picture of what is going on in our county." The same board member had shared, during the interview, a lack of transparency in developing agendas. On the day of the board meeting where the interim superintendent candidate was to be presented, the board member was told by a community citizen who the person was and that the vote would be that particular night. The information did not come through a regular board meeting channel. Another example of lack of protocol includes the night time custodian at one of the elementary schools told his principal after the fact that two board of education members came to the elementary the night before (9/22/2014) to check on him because his car had a broken window. The custodian allowed the two board members into the building and indicated the two board members went in to look at the water heater situation in the kitchen. The custodian indicated to his principal that he didn't feel it was his job to tell the board members that they could not come in the building after hours even knowing it was without the knowledge of either the interim superintendent or principal. The principal alerted the interim superintendent that this happened, and was told that it was not his job (the interim) to tell the board members not to be in the buildings.

Several interviewees expressed concern that the chair of the board has been seen sitting in a driveway across from one school to watch the activity at the beginning of the school day. Several expressed the feeling of discomfort this practice creates. Although the actions may not violate legal statutes, the processes and protocols are not in place that would assist in alleviating the anxiety among the stakeholders who are involved. The board members expressed that they have interest in what is going on in the schools, but the current climate, lack of understanding of roles and responsibilities and lack of proper communication channels creates the climate of mistrust. People who were interviewed were unusually open and willing to share first hand examples of what was going on, asking interview team members for assistance.

Deployment: how the approach is applied in addressing values relevant and important to the organization (performance goals); if the approach is applied consistently and is it executed by all the appropriate work units (offices, departments).

1. How far into the organization is the understanding of how the district is governed?

Lack of clarity of roles and responsibilities, lack of a consistent plan for appropriate training for new employees, lack of a clear procedure that is consistently applied for the hiring and firing of staff, lack of structure for collaboration among key stakeholders in decision making, lack of use of the CDIP as a strategic plan that actually guides the work and the lack of a communication structure that has the trust of all the stakeholders have contributed to a lack of understanding on how the district is governed. Although the board authorized a team from Wolfe County to train the finance officer and staff, in fact, at the time of the audit visit, the Wolfe County employees were performing the functions evidenced by budget reporting forms and district/school personnel needing to speak directly to the Wolfe County personnel or wait until the Wolfe County personnel are available for answers. There is not an expectation of a finite length of time for the training nor was there a clear plan for the training that was to occur.

2. How do you know?

No one who was asked saw the Comprehensive District Improvement Plan as the strategic plan for the district guiding decision making. Although the plan was discussed and voted on as required, there is no regular follow-up on how the plan is moving the district. Almost all groups expressed concern about test scores, but there is not an overall approach for getting the work done. The pervasive issue of conflicts that result from gossip and rumor was acknowledged with the plan in Goal 2, but there is no evidence that it was deployed. Specifically, Goal 2 of the plan is to continue to provide transparency and increase effectiveness in the operations of our school district. Strategy 1: Transparency; Strategy 2: Culture.

During the visit, some people (5-7) did not want to be interviewed at the district office for fear of retribution. Others indicated they feared they would not have a job if the interim superintendent or the two board members found out what they had shared. At the same time interviews with the board members showed a common desire for things to be better and that it needs to be about the children.

In the interviews for this section of the report, it was a board member who indicated that what needed to change was an emphasis on math and a parent who touted the benefit of dual credit courses at the high school. All interviewees indicated that they loved Menifee County Schools. Parents were passionate about the things that are right with the teaching staff and what is happening for their children. Both the Office of Education Accountability (OEA) (August 13, 2013) and the Auditor of Public Accounts (June 19, 2014) have issued reports with findings based on issues that there were no apparent ways to resolve within the district. The Attorney General prosecuted and ultimately settled litigation pertaining to an issue of violation of a state statute regarding board member attendance.

In the management audit interviews (September 15 and 16), concerns about retribution from the other side of the divided governance and management system were repeatedly brought up (17 of the interview sessions) and it did not matter which side of the divide the interviewees were on. Whether officially resolved or not, the concern around increase of attorney fees over the past year was mentioned in 12 of the interviews for this section of the report.

The lingering issues that are negatively impacting Menifee County Schools to the extent of impeding the movement of student achievement forward are hiring/staffing, inconsistent or non-existent, repeatable processes and the culture/environment created by controversy of perceived allegiances and retribution, broken trust and lack of belief that anything will get better without intervention.

Learning: how the organization refines the approach through cycles of evaluation and improvement (over time and several data points); encourages breakthrough change to approach through innovation; shares refinements and innovations with other work units and processes in the organization.

1. How are changes in policy and administrative tasks communicated in the organization?

There is no evidence of a repeatable process. Although the district subscribes to the KSBA policy service, it is not clear what the process is for ensuring policy is translated into implementation.

2. How do they know that the policies and procedures are working?

There is no evidence of a Comprehensive Evaluation Plan being deployed although one does exist in ASSIST. There is no evidence that there are procedures for carrying out a district directed process in

these areas nor is there a protocol for evaluating effectiveness of policy. The board is working with an attorney and will have an attorney present at all board meetings perhaps to assist with this function.

3. What are the processes in place to change the policies and procedures?

Principals for the most part are in charge of the processes in their buildings and have active SBDM councils, which enable the schools to operate. The disconnection is with central office functions and actions of the board. For example, although curriculum and instruction, finance, principals and safe schools have a regular item on board meeting agendas, it is not clear that there is a connection among these reports and an understanding of the board role in related actions and activities. No needs assessment has been conducted in recent years of what are the actual classroom and student needs to connect all of these stakeholder considerations into the budgeting process. The needs assessment in the CDIP is compliant but no one interviewed connected it with the work. At the time of the visit, SBDM budget amounts for the schools were not known by the principals.

Integration: The approach is aligned with the organizational needs identified in the CDIP or CSIP or KBE goals and other departments; the measures, information and improvement systems are complementary across processes and work units; the plans processes, results, analyses, learning and actions are harmonized across processes and work units to support organization-wide goals.

1. What evidence is there that the policies and procedures work together for the goals of the school district/student achievement?

It is positively evident that the community is supportive of the Menifee County Schools. Parents are passionate about Botts, Menifee County Elementary and Menifee High Schools. Interviewers met volunteers that actually work full time in the schools. SBDM councils are active. The community turns out for fundraisers and activities. As one parent said, "They'll run over the top of you for a ballgame here." With budget reductions, people are doing far more with less. The stress is evident. That said, there is little evidence that policies and procedures work together for the goals of the school district/student achievement as will be discussed further in this report in specific areas. From interviews, it is apparent that currently the community focus is on the controversy and division of power.

PLANNING Recommendation: State assistance is needed to correct the significant lack of effectiveness and efficiency in the development, adoption, and implementation of planning processes.

II. Operational Support - Food Services, Facilities, Transportation

- a. Team Members: Justice/McIntosh
- b. Persons Interviewed: Interim Superintendent, food services director, a principal, food services staff

Approach:

1. Who is the leader of the operational systems in the district?

Interim Superintendent - administers maintenance and facilities
Food Service Director - administers the food service program
Principals - hiring and supervision of food service staff

The team did not interview the principals but the Meniffee Elementary principal voluntarily spoke at length about concerns relating to his facility and conflicts with district administration. The Botts principal gave team members a tour of the school building.

2. **What processes are in place to ensure they operate appropriately?**

Interim Superintendent: A process is not in place. They only have one maintenance person and the superintendent calls him when maintenance concerns are identified. A work order process is not utilized. **Food Service Director** - CNIPS (Child Nutrition Information and Payment System) is utilized as required by the state agency. The transportation system staffing requires the transportation director (who is also the DPP, the safe schools coordinator, the district health coordinator, and the chemical hygiene officer for the high school) to function as the bus driver trainer and he drives a bus most days. The mechanic also drives a bus daily. KDE recommends one technician (mechanic) to every 20-25 buses for a properly functioning bus garage. Meniffee County has 23 buses, which would require one full-time mechanic. This employee performs mechanic work for six hours per day and drives a bus for two hours per day during the school term. In the summer months he works full-time as a mechanic. The district does not have a physical bus garage or bus shelter. Instead, they have a 12x16 storage shed to house tools. There is no shelter from the elements and the district does not have a bus lift, which is a basic best practice for transportation maintenance.

The current district facility plan was approved by KBE in June 2013 as required. It lists three Permanent School Centers: Meniffee County High School, Meniffee County Middle School and Meniffee County Elementary School. KDE currently has inventory files for 1) Botts Elementary (Transitional to Central Office/Alternative School), 2) Meniffee Elementary School, 3) Meniffee High School, and 4) Meniffee Central Office. An inventory file for Meniffee Middle School is not available. From 2000-2015, the district has closed out 17 of 19 projects. The two currently active projects were recently initiated. One project was initiated in FY10 (BG 10-257) and the other in FY13 (13-107). The district's average cost of delivery of services for FY 13 was \$11,304, which is greater than the state average of \$10,174. Meniffee ranked 128 out of 168 for this indicator.

Three of the four school buildings appeared on the Kentucky Facilities Information and Classification System (KFICS) report indicating the 485 worst buildings in the state at the time and that the district has failed to maintain or replace systems as they age. Review of the capital projects undertaken by the district since 2000 indicates crisis management with many projects identified due to their emergency nature.

3. **What documents and policies are in place to support operations?**

Interim Superintendent: A work order process is not utilized; therefore documents to support maintenance work are not available. **Food Service:** Documents and policies on file with the KDE/Division of School & Community Nutrition include, but are not limited to, a Permanent Agreement, a Free & Reduced Price Policy Statement and an annual application for participation in the National School Lunch & Breakfast programs. The food service director submits monthly claims for reimbursement and has policies and procedures for meal counting and claiming, benefit issuance, Direct Certification and all other required elements of the food service program. Labor studies of all 3 schools were provided by the food service director.

The district has a transportation manual however it needs to be updated from the 2010-11 year. Most of the content is derived from the KSBA standard policies.

Deployment:

1. How are operational processes deployed and how do you know they are working?

Interim Superintendent: A process is not in place. The district has one maintenance person and the superintendent calls him when maintenance concerns are identified. A work order process is not utilized.

Food Service Director: It is evident that the issues of lack of systemic protocol for communication and processes between the board and interim superintendent create stress in the area of food services, also. The food service director is a relative of the former superintendent. In interviews issues with the current interim superintendent, board members and central office staff were discussed. The director, with the approval of the superintendent, moved out of the central office and to the elementary school in order to participate in the nutrition component of the Carol White Physical Education Grant. The director later received an e-mail from the interim superintendent instructing her to move back to the Central Office but only during the management audit. The director did not relocate. Another example of perceived random decision making impacting efficiency was when the director stated that politically driven decisions regarding KEDC/CKEC contracts have negatively impacted food services while increasing food costs.

The KDE transportation review confirmed compliance with bidding requirements for the purchase of transportation equipment and materials.

The district prepared BG Form 13-107 dated 10-22-2013 for a capital project. The bidding process of this project was noncompliant. The June 5, 2013 addendum "pre-dates" KDE's June 10, 2013 receipt of the bidding documents, indicating that the district advertised for bids prior to KDE review and approval of the bidding documents violating 702 KAR 4:160, which requires KDE approval prior to advertising for bids. The district employed an Architect or Engineer for 7 of 19 capital projects and one project utilized a Construction Manager. The School Facilities Construction Commission (SFCC) confirmed no SFCC offers have expired and the next offer of assistance does not expire until 2020. Significant roof issues exist at Menifee Elementary. Just before school started this year, a large amount of tar entered the building from the roof. Audit team members noted they saw what appeared to be mold and experienced respiratory discomfort while in the building. This item was reported to KDE immediately.

Interviews revealed that there are no protocols for who has keys to buildings. Several members of the public have keys to district facilities and individuals have been utilizing the schools without school staff present as evidenced by school staff repeatedly finding exterior doors unlocked.

The "Old Botts School" is used for community events. These events are scheduled by a five-member committee comprised of one board member and four community members. Every committee member has a key to the building. The school district owns the building and maintains it, resulting in additional cost to the district for utilities, insurance, and lawn care. Without a school employee present at events, potential insurance claims could be denied.

Bus routes were reviewed and found to be well-balanced with the average ride time ranging from 40-55 minutes.

Learning

1. How do operational systems use data and information to improve?

Interim Superintendent: There is no indication that data and information are used to improve the operational system.

Food Service Director: The director attends state agency trainings and professional development conferences, which she applies to her work.

Integration

1. What evidence is there that learning is shared throughout the organization?

There is no evidence. The interim superintendent has made decisions regarding food service staff without informing the food service director or principals. The culture issues for the district were evident in these interviews. The food service director's first statement during the interview was "everyone is on the defense."

The principal at Meniffee Elementary stated he will be "gone" if the interim superintendent is hired permanently. He also stated he has, at times, received support from the interim superintendent only to be later reprimanded by him as a result of a directive from a board member.

Operational Support Recommendation: State assistance is needed to correct the significant lack of effectiveness and efficiency in the development, adoption, and implementation of operational support processes and to provide support for improvement of the overall operational condition of the school district.

III. Financial Management

- a. Team members: Barkley/Binder
- b. Persons Interviewed: 1) Face-to-face: finance officer, former finance officer, contracted finance staff, contracted payroll clerk, accounts payable clerk, payroll clerk, secretary/personnel specialist/board treasurer, interim superintendent, board chair; 2) telephone: former auditor

Approach

1. Who is the leader of the financial management system in the district?

There is a finance officer designated in the district. In implementation, there is no leader of the financial management system.

Many of the job duties of the finance officer and payroll clerk are being performed by two staff from a neighboring district and are not bonded for faithful performance in Meniffee County. Interviews revealed that Meniffee County staff direct questions to these contracted individuals instead of the finance officer.

In interviews, the finance officer was unable to provide basic financial information such as the current bank balance, the number of bonds outstanding, or the months bond payments are due. The finance officer has no education in accounting or finance. The FY 15 working budget has been developed by the

contracted finance staff with no participation by the current finance officer. A copy of the working budget was included in the board packets; however, the finance officer had no plans to present during the board meeting where its adoption was discussed. The current finance officer provided no recommendation regarding the tax rate, was unsure what the board would be voting on, and did not prepare any of the information regarding the tax rate options. The finance officer gave no suggestions for improving the current financial condition of the district except to tighten controls on spending. Other staff in the district expressed concern that the finance officer does not have the capacity to perform the job duties.

2. What internal controls are in place to ensure the fidelity, efficiency, and accuracy of the financial records of the district?

The contracted finance staff verified all payroll costs in the working budget but did not perform verification of other expenditures, such as occupational therapists, physical therapists, or other contracted special education services, insurance, and workers compensation premiums. Additionally, the FY 15 working budget includes \$0 (in either the finance office or the payroll office) for the financial services being performed by the contracted finance employees. Not only is the district obligated to pay for services already rendered during FY 15, the interim superintendent and board chair intend to continue that relationship at least through the end of the calendar year. The FY 15 working budget includes only \$25,000 for legal services for the board despite the litigious climate evidenced by activities of this board. Data regarding average daily attendance and the December 1 child count are not utilized in the budget preparation process. No one interviewed could verify the tax rate utilized in the budgeted revenues included in the working budget. A review of the district budget reflects a significant increase in estimated Medicaid revenue from \$15,000 in the FY 15 *tentative* budget to \$115,000 in the FY 15 *working* budget. Only \$23,816 was actually received in FY 14 from this source. Neither the finance officer nor the interim superintendent participated in the budget development. The FY 15 working budget was developed solely by the contracted finance staff.

3. What is the relationship between the central office finance staff, the board of education, other central office staff, and the schools?

Actions of and interviews with the interim superintendent show little evidence of the capacity/experience to read and understand district financial reports. He receives no information from the finance officer regarding the financial condition of the board or the bank balance. The interim superintendent does not directly communicate any financial information to the board. A limited amount of this work is occurring through contracted employees but not the Menifee County finance employees.

As evidenced by board minutes and video, the board chair has refused at times to allow staff or community members an opportunity to address the board resulting in evictions from open meetings. Examples of people to whom there is evidence this has occurred include the former superintendent, finance officer, student group sponsor, family resource center coordinator, and a parent.

Deployment

1. How are the finance internal controls deployed throughout the district?

The district was unable to obtain a fidelity bond for the finance officer appointed July 1, 2014 as required by 702 KAR 3:080(2)(1). The interim superintendent was not aware of this requirement. He was aware, however, that KRS 160.560 requires a fidelity bond for the board treasurer. In an effort to

resolve the quandary, the finance officer resigned from her position as board treasurer on August 28, 2014 with an effective date of August 21, 2014. The board voted to accept the resignation at the August 21, 2014 meeting (Motion 51) and voted to appoint the secretary/personnel specialist as board treasurer at the same meeting (Motion 52). The newly-appointed board treasurer indicated she has not been given any specific duties related to the position. The job description for board treasurer includes many duties that she does not have training to perform, and does not perform, including conform with generally accepted accounting principles; analyze, review, and prepare financial statements and reports; invest idle funds; and review funds for cash flow analysis. She has been asked to sign the signature card for the bank and therefore, district checks are electronically signed by her and the interim superintendent; however, neither performs any review of invoices or orders of the treasurer. Local district department heads are responsible for bidding their own purchases, which increases the risk of noncompliance regarding bidding. The finance officer was unsure whether the district had adopted the model procurement code and therefore cannot provide adequate oversight of bidding activities.

The district is appropriately utilizing a purchase order system for all purchases except utilities with the interim superintendent's approval on all purchases greater than \$1000.

There is a significant internal control weakness in the disbursements process. A sole employee is responsible for all aspects of the disbursement process: enters vendors, enters purchase orders, enters invoices, produces checks, and completes the bank reconciliation. Best practice would indicate that some of these duties need to be assigned to other staff for internal checks and balances (internal control).

An internal control weakness regarding deposits exists. A sole employee is responsible for both taking deposits to the bank and reconciling the bank statement. Best practice would indicate one of these duties should be reassigned for internal checks and balances (internal control).

2. How do you know?

There is evidence that the lack of capacity in the finance office has resulted in worker status misclassification. For example, the two individuals from a neighboring district are being paid from accounts payable instead of through payroll as Internal Revenue Service guidance would require. Consequently, the individuals are not being given proper service credit through their appropriate state retirement system nor is the district funding the employer matching retirement contribution.

Menifee Elementary School's roof has failed due to numerous leaks while under warranty. The warranty company issued a two-party check in the approximate amount of \$172,000 to the contractor and Menifee County Schools for remediation. Interviews revealed that the check was endorsed by the contractor, the interim superintendent, and the board chair (not an authorized signatory on the account). The check was then given to the board attorney to be deposited in the law firm's escrow account. There is evidence of management override of internal controls and procedures. For example, instead of following district purchasing procedures, the board chair incurred an expense for board member training, which he paid personally, and subsequently received reimbursement. The July 2014 bank reconciliation does not agree with supporting documentation. Several printouts from the financial management system (MUNIS) were attached to the bank reconciliation. These printouts were produced at various times over a three-day period. None of the printouts matched the amount used in the reconciliation for general fund cash balance. The difference, \$38,651, is an unreconciled amount between the MUNIS cash balance and the bank balance.

Learning

1. What data and information are used to improve the financial standing of the district?

In previous years, there is evidence that enrollment information was utilized to adjust staffing levels to prevent insolvency. Current staff, including the finance officer and the interim superintendent, show no evidence of the capacity to read and interpret financial information. Additionally, there is no leader of the financial management system to provide the "big picture" to management and the board. No one interviewed could articulate the current financial condition of the board with the exception of the board chair who understood the declining fund balance trend and the low contingency amount.

The board instituted a hiring freeze due to uncertainty regarding the budget. At the July 8, 2014 board meeting, the board lifted the hiring freeze (Motion 17) to hire school nurses and clerks at a significantly higher cost than the arrangement with the Health Department that had been utilized in the past. \$40,000 was included in the FY 15 *tentative* budget for the Health Department contract while \$91,077 was included for the staff employed in the FY 15 *working* budget. Mistrust surrounds a lack of consistent protocol in hiring processes with the reality that staff hired are relatives of the interim superintendent.

Review of e-mail correspondence with the board attorney revealed that the board chair and the board vice chair repeatedly made requests of the board attorney to make phone calls on their behalf and other administrative tasks, which could be perceived in the current climate in the school district as unwise use of public education dollars. Other board actions that may be considered unwise to the point of being wasteful include repeated, voluminous open records requests demanding district staff divert resources to these requests instead of furthering the focus of their work on educational goals and outcomes. For example, the board chair requested on March 12, 2014 copies of all e-mails, text messages, face-book (sic) messages and faxes sent between district employees or received by district employees from district employees or (3rd) (sic) third parties, from all I-phones, laptops, I-pads, personal computers or any other device connected to or using phone lines or other links provided by the Menifee County School System, from its server and including any and all deleted items, to be found on the server of the Internet or other service providers, that the district paid for from Nov. 2012, to present.

2. How do they know that the internal controls and other policies/procedures are working?

There is evidence that some good processes are in place; however, the entire finance staff lacks capacity. No employee in the financial management system has been serving in their current position for longer than a year with most beginning after July 1, 2014.

3. How is the board informed of the financial status of the district and the impact of the budget on student performance?

The board receives financial reports in advance of its meetings each month: bills paid in the previous month, bills to be paid for the current month, monthly financial report, and balance sheet. No oral presentation is made at the board meetings regarding the financial information. Board members may ask questions during the meetings. There is evidence that the board members do not understand the reports produced by the financial management system (MUNIS) and therefore, requests of off-system schedules are made. Off-system reports tend to be error-prone and may not agree with the information in MUNIS.

Integration

1. What evidence is there that the policies and procedures work together for the goals of the school district/student achievement?

Based upon an analysis of key financial indicators, the fund balance has been declining for the past four years with only \$89,702 in committed, assigned, and unassigned fund balance as of June 30, 2014 (unaudited). The unaudited financial statements indicate a bank overdraft of approximately \$50,000 on June 30, 2014.

KRS 160.470 requires districts to maintain at least a 2% contingency in the working budget, which is included. Interviews revealed the inclusion of many costs which have not been verified therefore causing the management review team to question the accuracy and reliability of the contingency amount. The district ended FY 14 with only 1.22%, a significant reduction from the 18.28% contingency at the end of FY 10. In addition, the audit could result in reductions to the fund balance included in the working budget.

Enrollment has declined over the past three years for a total reduction of 73 students. Staffing levels have been reduced in response to these declines in enrollment to prevent further damage to the financial condition. The district's bonding potential has been depleted by construction projects leaving only \$1,130,000 in current bonding potential with the majority of that amount derived from outstanding offers from the School Facilities Construction Commission.

Financial Management Recommendation: State assistance is needed to correct the lack of capacity and internal control weaknesses in the financial management system, to provide support to the district and to improve the overall financial condition of the school district.

IV. PERSONNEL ADMINISTRATION

- a. Team Members: Binder/Barkley
- b. Persons Interviewed: Finance officer, former finance officer, contracted finance staff, contracted payroll clerk, accounts payable clerk, payroll clerk, secretary/personnel specialist/board treasurer, interim superintendent, board chair

Approach

1. Who is the leader in hiring and staffing for the district?

There is no recognized leader in the personnel administration system. The interim superintendent makes decisions regarding hiring, transferring, and abolishing positions. The superintendent's secretary performs the administrative duties at the interim superintendent's direction. The superintendent's secretary has received no training for her position that has human resources responsibilities. There is no evidence of a structured system for hiring and transferring employees. In the current climate of mistrust that exists in Menifee County Schools, lack of protocol leads to specific accusations of favoritism and retaliation as shared with the interview team.

2. What processes are in place to hire and train certified and classified staff?

As supported by interviews and board minutes, the two contracted staff from a neighboring district are employed to provide assistance and training. While there is evidence of effective training for the payroll clerk, there is no evidence of training for the finance officer or person responsible for human resources.

An attendance review was performed by KDE for the 2014-15 school year in September 2014. The review found that school personnel had not been properly trained to administer attendance procedures. Food service staff has properly achieved the Level 1 certification and the food service director appears to be adequately trained.

3. What processes are in place to ensure fairness in staffing?

There is no transparent, consistent process for reviewing positions. For example, some employees receive overtime pay for their regular job assignments because they fill a 4-hr position and a 6-hour position simultaneously. There is no transparent, consistent process in place to ensure funds are available prior to hiring or granting additional days.

The salary schedules are approved by the board as required. However, there is no transparent consistent process for the schedules. For example, the bus driver pay is shown as \$71.14 with no indication whether that is an hourly, daily, or trip rate and some pages co-mingle hourly and annual rates. There was no evidence of a substitute pay schedule or a schedule for extra bus trip (including vocational) rates of pay.

Deployment

1. What evidence is there that the evidences mentioned in the approach are deployed in all staffing and hiring situations of the district?

There is no transparent consistent process for personnel transfers. Transfers of employees occur at the interim superintendent's discretion. There is evidence that sometimes this has been done prior to board creation of the position. For example, an employee received a transfer letter from the interim superintendent dated August 22, 2014 moving her into a teacher assistant position at the Menifee County Academy with her first day of work to be August 25, 2014. The board considered an item at the September 18, 2014 meeting (agenda item VI. C.) to create that position.

An individual was hired as a custodian for the 2014-15 school year as documented by a letter of employment from the interim superintendent dated August 4, 2014. On August 5, 2014 another letter was issued stating the hire is pending a "one month trial period and contingent on a healthy budget". Finally, a letter was issued on September 3, 2014 stating "you were notified that a janitorial position may be available based on the 2014-15 budget. I am regretfully notifying you that the position will not be funded for this school year."

There is no transparent, consistent process for ensuring the most highly-qualified candidates are being chosen for positions. There is evidence that individuals are hired for positions for which they do not possess the qualifications and/or certification required. For example, a posting was made on September 4, 2014 for a Gifted & Talented Coordinator. The posting specified that the successful candidate would not only lead the work with gifted and talented students, but they also would teach one class of

Arts/Humanities, one class of Practical Living, and one class of Careers at Menifee Elementary. The individual chosen for the position received a letter of employment from the interim superintendent dated September 12, 2014 and signed an employment contract that same day. The individual does not possess the certification required for this position.

Another example is the offer of an employment contract for the Community Education Director position to an individual who does not possess a bachelor's degree. The salary schedule indicates a bachelor's degree is required for this position. A letter of employment was issued to the individual dated September 3, 2014 stating "this is official notice that you are being transferred into the Community Education Director's role effective immediately. Please continue your original duties as previously assigned." This is not a position for which the person had applied.

The position of Attendance Specialist was abolished by the board at the September 18, 2014 board meeting (agenda item V. C.). An attendance audit by KDE revealed that the Truancy Diversion Program has not been effectively implemented and that habitually truant students are not being adequately addressed. In addition, the director of pupil personnel (DPP) also is the safe schools coordinator, the district health coordinator, the chemical hygiene officer for the high school, transportation director, bus driver trainer, and drives a school bus most days, which seriously interferes with his ability to carry out the duties of DPP. KRS 159.140 requires that the DPP devote his or her entire time to the duties of the office unless the local superintendent properly notifies the commissioner of education of his or her decision to waive that requirement. No such notification has been made. The interim superintendent indicated during interviews that the Attendance Specialist position was abolished because the duties appeared to be duplicative of the DPP duties and therefore that position was no longer needed.

Learning

1. **What measures of effectiveness are gathered to improve the hiring and staffing system, especially in gap areas?**

The team found no evidence that effectiveness measures are utilized to improve the hiring and staffing of individuals in any area. In some cases, required certifications were not held by individuals employed. The principal was not aware of the hiring decision of the gifted and talented coordinator even though the person is responsible for teaching three classes.

Integration

1. **What evidence is there that employees understand the hiring practices and that it is systematic?**

Due to the lack of a systematic approach and the lack of structured policies and procedures surrounding the hiring and transfer of employees, persons interviewed believe acts of reward and punishment are prevalent given the current climate of distrust in the Menifee County School District.

2. **What evidence is there that the staffing works with the goals of the school district /student achievement?**

The most qualified individuals are not always selected to fill vacant positions. For example, the board voted July 18, 2013 (Motion 16) to require a minimum of an associate's degree in accounting and 2-3 years' experience in accounting (MUNIS) for the finance officer position and although the district received an application from an individual possessing such a degree, the individual selected as finance

officer has no education in accounting or finance. Although the current finance officer had been employed as Menifee County Finance Officer five years earlier, she was removed from that position by the former superintendent. When asked what position she held in the school district in the interim, she responded "a paid nana". The job description for the finance officer position states that responsibilities include "coordinate the on-going budget operations, including planning, compiling, analyzing, preparing, and monitoring"; however, the finance officer was not involved in the working budget preparation. The employment contract for the current finance officer was signed July 1, 2014. During the July 22, 2014 board meeting, the board voted to rescind Motion 16 from the July 18, 2013 meeting to change finance officer qualifications to the state requirements, due to the "emergency situation". The state does not have minimum requirements at this time. The FY 15 classified salary schedule adopted July 22, 2014 indicates the finance officer must possess a bachelor's degree. Due to the financial condition of the district, the board instituted a hiring freeze. Board minutes show the board temporarily lifts the hiring freeze for the sole purpose of adding positions. For example, at the July 8, 2014 board meeting, the hiring freeze was lifted (Motion 17) "for the hiring of school nurses and clerks".

Personnel Management Recommendation: State assistance is needed to develop and implement effective systems for the hiring, transferring, and training of personnel.

V. Instruction Management

- a. Team Members: Brock-Greer/Radford
- b. Persons Interviewed : 1) Face-to-Face: interim superintendent, instructional supervisor, DAC/psychologist, director of special education, 11 certified staff members, and 5 support staff. All 16 staff interviews represent a cross section of roles and responsibilities from each school in the district. 2) Attempts were made by the team to schedule a phone interview with the Job Corps Director, but those attempts were not successful.

Approach

1. Who is the leader of the curriculum and instructional processes in the district?

The district leader for curriculum and instruction is a Supervisor of Instruction (SI). During most of the 2013-14 school year and the beginning of the current school year, the Supervisor of Instruction served as the Assistant Principal at Menifee Elementary to support the new Principal who was moved to the Head Principal slot shortly after the year had begun. There are approximately 500 students enrolled at the school causing this assignment to usurp much of her work day. As a result, interviews and review of evidence demonstrate that there is not a systematic process to improve curriculum, instruction, and assessment that focuses on improved learning for students and adults. She no longer holds the Assistant Principal position, but the assistant vacancy has not been filled.

In addition to curriculum and instruction roles, the SI is solely responsible for district-wide implementation of the Professional Growth and Effectiveness System (PGES) since the piloting two years ago. There is not clear evidence that the Director of Special Education (DoSE) leads in any pieces of curriculum and instruction. Walkthroughs were not readily referenced as part of DoES duties. During her interview, the DoSE noted that there are some good examples that the co-teaching model is occurring in the district. There is little evidence of a systematic process for using student data to inform curriculum and instruction. There is evidence that the District Assessment Coordinator works closely with the SI to construct the CDIP and on Data Days that follow the release of test data. At this point, it is not evident that the data analysis results in regular improvement in classrooms which would ultimately be evidenced by improvement in proficiency and college-and career-ready rates of students.

2. What processes are in place to ensure that core curriculum is aligned with state standards processes and horizontally aligned within the district?

The Comprehensive District Improvement Plan (CDIP) has been approved by the local board of education, posted on the district website, and uploaded into ASSIST. The Comprehensive School Improvement Plans (CSIPs) followed suit. The SI and the DAC work closely with principals to develop these documents based on data. There is some evidence to suggest that the SI has led an effort for vertical alignment during district professional development days; however, through stakeholder interviews with teachers and school leaders, this process has not reached students' desks for effective monitoring and improvement that is focused on student learning. Pacing guides and curriculum maps were developed and are still under revision, especially to include science and social studies standards for assessment.

Curriculum documents illustrate reflections and notes for revision based on analysis of lesson deliveries. However, there is no evidence (documents or interviews) to suggest that there is consistent professional learning community work even during common planning for some grade levels. Therefore, it is unclear as to whether curriculum maps and pacing guides are being followed with fidelity or that they are being refined based on student data. Lesson plans are uploaded to CIITs. During interviews, teachers expressed concern regarding the less than rigorous expectations for students during years prior to their courses, especially if the previous content was a non-assessed course.

MAP has become a routinely administered screener for Menifee County Schools. However, a clear and systematic plan for how this data will directly impact student achievement is unclear. Teachers noted their support for implementing a screener but expressed a desire to disaggregate the data further to use the reports to inform daily instruction. Teachers have been trained to access the MAP reports but plans for training beyond this to include using this information to determine skill deficits and needs for intervention remain unclear.

3. How do you measure effectiveness of these processes?

The audit team discovered through interviews that district leadership meetings with principals have stopped along with the focus on student achievement. As a result, documentation suggests that the SI and the DAC meet with principals to review and discuss the continuation of work on the curriculum documents. Still, there is no evidence of a systematic protocol to progress monitor the effectiveness of these documents. Teachers informally meet during planning time to discuss curriculum. There is not a formal Professional Learning Community (PLC) protocol to drive continuous improvement that improves teaching and learning. Some teachers reported that student data was analyzed but they could not provide specific information concerning the degree to which the analysis was used to impact student achievement. There is no evidence that measures for these processes are systematic nor are they part of a continuous improvement cycle. Teachers agreed that teachers and students are working hard but when asked about next steps to improve student achievement, measures for effectiveness were not referenced. Class size reduction, additional staff members, and money to purchase resources and programs were the list toppers for next steps.

MAP is implemented across the district. Communication of this data to parents and students was not referenced or evidenced. No artifacts were shared to suggest a clear process for the utilization of this data for student or parent goal setting at the school level. The district office staff, SI and DAC work with the data during Data Days.

In state accountability performance, Menifee County's district Overall Score fell to 51.7 in 2012-2013 from 52.6 in 2011-2012. In 2012-2013, the district did not meet its Annual Measurable Objective (AMO) goal of 53.6. The district classification is currently "Needs Improvement." Graduation rate was met. PGES was piloted district-wide two years ago. The walk-through forms being utilized by the SI have evolved to represent the domains from the Danielson Framework.

4. What processes are in place to ensure that rigorous, engaging instructional strategies are used in classrooms?

The Certified Evaluation Plan was approved by the local Board of Education and by the Kentucky Department of Education. School-level principals are required to complete a large number of teacher observations and conferences based on the model. The direct impact of this work on teachers and principals was not provided. One teacher referenced being a member of the committee who created this model but was unclear of the actual process. No other teachers referenced the evaluation plan.

Neither rigor nor instructional best practice was readily referenced as a focus or guiding premise for all of the work. Evidence demonstrates that teachers are not utilizing a Professional Learning Community (PLC) process that focuses on rigorous instructional activities nor are they referring to best practices to improve student learning. In addition, there also exists an absence of analyzing student work that informs teaching and learning.

All interviewees, aside from the Interim Superintendent, spoke in depth to the culture of the district being characterized by the lowest staff morale ever seen. Common consensus was that the lack of collaboration between the Interim Superintendent and staff, the random actions of the board members, and the attempts of the board members to control day-to-day operations of the schools (i.e., lack of hiring processes, personnel information requests, open records requests, personnel demands/reprimands, complete lack of collaboration with decision making) created daily fear of retribution for staff who disagree openly with current practices. Staff also fears that this culture will invade classroom settings and negatively impact student learning.

Based on interviews, the SI is solely responsible to complete district walk-throughs. She is responsible for the evolution of the walk-through forms.

5. What evidences are there of alternative programming for students?

There is evidence in ASSIST that the district has met the requirements for raising the compulsory attendance age to 18. No one interviewed mentioned alternative education readily with the exception of cursory mentions of the Job Corps program. Written documents reference Odyssey as a major intervention for students, but there is no clear evidence of its effectiveness or how the district will determine that effectiveness for future budgeting.

According to the school district: "The Menifee County Academy (MCA) is a residential preparatory academy located on the campus of Frenchburg Job Corps Center. MCA is an accredited high school that makes it possible for eligible students to earn a high school diploma while participating in the Job Corps program. Since the Academy is a collaborative partnership program with Job Corps, students have access to several programs beyond that of earning a diploma. Frenchburg Job Corps offers a GED program, driver's education, and several vocational training programs. At the Menifee County Academy, we support the mission to provide each student with the knowledge and training necessary to become a

successful and productive citizen. This is accomplished by ensuring students' needs are met both academically and emotionally by providing the opportunity to participate in an educational program in a safe and nurturing environment. Students enrolled in MCA will receive counseling, preparation for the workforce, and career exploration.”

It was not clear through the interview process how successful any or all of the alternative interventions are or if there is a systematic process for a continuum of services for students.

Menifee County Schools provides four employees for the Job Corps site. The interim superintendent has worked there previously and indicated that as a result, he had not been a part of the PGES efforts.

6. What documents, policies, procedures are being used to ensure curriculum/special education requirements are being met?

Principal meetings are conducted with the Director of Special Education (DoSE). Interviews suggest that paperwork is monitored for compliance and accuracy of referrals, and interventions are happening effectively. The DoSE indicated that referral rates had decreased from elementary to secondary. However, no documentation was provided to support any progress. Through interviews, there was no indication of an understanding of student learning for those who have an IEP (i.e., Gap Delivery Target, MAP, or Think Link Data). Job descriptions are housed in a binder with the Interim Superintendent’s secretary. However, interviews with district office staff reveal that these documents do not offer the real scope of the work for each position. Interviews of district and school leadership clearly illustrates that the shuffling of staff and random hiring of untrained employees also adds ambiguity to job roles.

The DoSE conducts special education training meetings with appropriate staff members. She also informally trains and coaches Admissions and Release Committee (ARC) chairpersons. Interviews with the DoSE indicate that special education paperwork is reviewed for compliance through unannounced pulling of student folders. No documentation was provided to the team in support of progress. No mention was made of the use of student data to determine decisions for student with disabilities.

There is a district approved Response to Intervention (RTI) policy but no comprehensive plan was provided to the team.

7. How do you measure effectiveness of these processes?

Through interviews, it was reported that the monitoring and reviewing of files, referrals, and interventions are used as measures. However, there was no evidence of a documented process concerning how these measures are used or applied to determine success for students with disabilities.

Documented processes for progress monitoring of measures of effectiveness was not evidenced.

Based on interviews with district office staff and principals, leadership meetings focused on instruction are no longer occurring. It is not clear how much or to what extent the conflicts within the communication system and lack of protocol impact the education of students with special needs.

Interviews suggest there is little discussion of student test scores beyond surface analysis. There are no formal, systematic processes in place to direct how true disaggregation of data informs school improvement planning for students with disabilities or students not receiving special education services for that matter.

Deployment

- 1. What evidence is there that the processes identified are deployed with fidelity throughout the organization?**

Through review of documentation and interviews the deployment of any process for effective curriculum management cannot be found systematically. There are pockets of success, such as the growth of student achievement data on the State Report Card (SRC) for Menifee Elementary School suggesting curriculum and instructional work with teachers has had an impact. However, student achievement data suggests this is not a system-wide deployment as evidenced by the student achievement data for the district on the District Report Card. Work is being done by individual schools with individual SBDM councils and individual principal direction. Parents were supportive of the individual schools and what is happening for the students. At the same time, the lack of visionary direction for the system penalizes and limits the building of capacity for rigor and systems of support for teachers, administrators and students.

Learning

- 1. What processes are in place to use data and information to improve learning processes?**

There is evidence to suggest that the instructional supervisor and DAC meet with school principals to discuss data and improvement planning. However, these meetings are in the infancy stages of implementation.

- 2. What evidence is there that these are working?**

A systematic process for utilization of formative data to inform instruction was not produced. The district college and career readiness rate is at 39.7 with the state rate at 54.1. The district K-PREP test data reflects that the only area where the district tied or exceeded the state rate was in middle school writing. Other School Report Card data does not suggest that data is being used to improve learning processes. Paper documents and policies/plans do exist and suggest systems but the data does not reflect that they are systematically deployed throughout the organization.

- 3. What data and information are used?**

There is clear evidence that work has occurred to develop the Certified Evaluation Plan (CEP), align the Kentucky Core Academic Standards (KCAS), and implement an assessment system (MAP or Think Link). However, review of evidence and stakeholder interviews illustrate that this work has not continuously improved teaching and learning in the classroom.

Integration

- 1. How is the learning from each of the levels used to improve the overall system?**

Due to the lack of consistencies of processes regarding teaching and learning from the school district to each school, there is very little evidence suggesting that learning is occurring to improve the overall instructional system in order to increase student achievement. Some processes are in place and some

important work has been done, but the impact on teachers to support students is very limited. Interviews conducted clearly indicate a request for help and guidance to support all students and adults in Menifee County Schools. There are many dedicated staff members who care deeply about the community and the students.

Instruction Management Recommendation: State Assistance is needed to develop and implement effective systems for delivery of curriculum, instruction, and assessment through data use and best practice.