

<p><b>I. Local Governance, Policies and Procedures</b></p>	<p><b>Allred, Lang, Moore</b></p>	<p><b>Persons Interviewed:</b> Interim Superintendent; Contracted Substitute for Interim Superintendent; all Board members; Principals; Child Nutrition, Finance, Curriculum Instruction (DAC); Technology, Board Attorney. Interview scheduled for Assistant Superintendent/DPP, but examiners were unable to conduct the interview because the Assistant Superintendent/DPP was on medical leave through January 2013.</p>
<p><b>Approach</b></p> <p>The approach addresses the methods the organization uses to accomplish the work; the appropriateness of the methods to intended outcomes; effectiveness of the methods, the degree to which the activity is repeatable and based on reliable data and information</p>	<p>Who is the leader of the governance and management system?</p>	<p>There is no evidence of an effective leader in governance.</p> <p>The previous superintendent was forced to resign unexpectedly in May. After the superintendent resigned, it was unclear who would assume the duties of the superintendent. The board considered options but ultimately decided to hire someone who was not currently working for the school district.</p> <p>The person selected to serve as interim superintendent agreed to a one year contract. Five months later, the board placed the Interim superintendent on suspension with pay for an indefinite period of time. The board then selected a substitute interim superintendent to work for the district on an as needed basis until the interim superintendent issues were resolved.</p> <p>The board and the substitute interim superintendent did not execute a written contract. The substitute interim superintendent informally agreed to serve as a substitute and agreed to accept compensation on a day-to-day basis. The interim substitute superintendent's first day of work was Tuesday, October 30, 2012</p> <p>The school board consists of 5 members.</p> <p>At the time of the audit, there were two experienced board members (over 15 years of consecutive service for each); two board members were appointed by the Commissioner in the last six months; and the fifth board member has been serving since he was elected in 2011. One of the experienced board members serves as board chair person and has been serving in that position for only 3 months.</p>

		<p>Since the on-site collection of information for the audit, one of the two experienced board members retired; one of the experienced board members was re-elected; one of the Commissioner’s appointments was defeated in the election and is to be replaced effective immediately; the other appointment will continue to serve on the board.</p> <p>There is no evidence of focused direction based on a common vision and goals for Breathitt County Schools although the interim superintendent provided an ILP which she developed with her vision for the district. In no interview was the document referenced by any other staff or board member.</p>
	<p>What documents, policies, procedures indicate how the schools are governed?</p>	<p>Board policy books were not readily available. Examiners reviewed one board book from 2010. The examiners were assured the board policy books exist but no one available to talk with us knew where they were. Board minutes and agendas from the past 6 months were made available via e-mail. Minutes show no evidence of direction, mission, vision and values of the district.</p> <p>The Board policies are on the KSBA website. There is little evidence that board members have had sufficient training for functioning at high levels or addressing the intensive issues that face the district.</p> <p>There is little to no evidence that policy has intentionally been addressed with procedures and protocols for use throughout the district for deployment of policies.</p>
	<p>What are the organizational structure and job descriptions of the central office?</p>	<p>An organizational chart is in existence but is not clearly aligned with what the people are currently doing. The assistant superintendent is currently on medical leave and serves as DPP. He has not been replaced and DPP responsibilities have been spread across various offices. There is no personnel director. All personnel processes are functions of the finance office. There is no evident FRAM position as required for the Community Eligibility Option in Child Nutrition.</p> <p>The governance structure is dependent on most urgent need. Although the suspended interim superintendent provided a Superintendent’s ILP dated May 2013 showing her direction for the district, there was no clear evidence that the Board or other employees were aware of it. All interviewees from the central office level were candid about the uncertainty on any given day of what the work is. There is little to no clerical assistance in the central office for child nutrition, curriculum and instruction,</p>

		<p>DPP responsibilities, and functions of the Board. Two clerical workers have been on medical leave and while absent, work was assumed by the director creating efficiency issues such as continuity of board documents; and support for Federal programs going into the school year.</p> <p>Some elements of district work are not directly connected such as the area technology system (TEDS) and the work with Infinite Campus not being centrally coordinated.</p>
	<p>What are the communication structures in the school district?</p>	<p>Most all communication is informal with no evidence of a system of support for goals, vision and values as the driving force of the communication. The interim superintendent uses e-mail for most direction to schools and office personnel; there is evidence that much board work goes on behind the scenes as evidenced by examiners being told about particular situations from the interim superintendent, principals, board members and board attorney and all having a different recounting of what happened on the same topics with the minutes only reflecting the board voting. Issues recounted by all the interviewees but with different facts were about the hiring process; the board agenda development; purchase of trays to replace Styrofoam in the cafeterias, and financial processes.</p> <p>There is evidence of frustration on a regular basis of ineffective communication and lack of understanding among all stakeholder groups. There is a disconnection between expectations of the community and student achievement and perception of the work of the board. There is no evidence that the interim superintendent or the substitute superintendent were given direction from the board as to what to do or how to work but hired to do the job, whatever it is. Historically in Breathitt, superintendents are expected to know what to do. In current practice there is disagreement on what the direction is with no apparent way for two way communication to occur that can resolve an issue without conflict between the interim superintendent and the board.</p>

		<p>An informal structure for the running of the schools exists among the principals who make de facto decisions regarding what to do when. Principals voice support from central office individuals but no clear direction do they appear to expect or necessarily feel they need from the central office. Current configuration of the schools (i.e., K-7, 8-9, and 10-12) was mentioned frequently as an ineffective model that was created primarily to attempt to keep Rousseau open (89 students). It has created issues with 9<sup>th</sup> graders accessing the courses that are necessary for college and career readiness. The conversation around the changes indicate that all (board, interim, leaders) want it changed but seem helpless to make the changes.</p> <p>There are few if any examples of collaborative processes that result in a plan that is deployed. Budgeting and alignment of K-12 curriculum and support processes are handled in isolation with the exception of where KVEC has assisted with curriculum and instruction related to state initiatives. The principals are participating in the field testing of PGES for professional growth and effectiveness.</p> <p>The Board learns about test scores annually when principals individually report at board meetings. School Based Decision Making will be discussed later in this report.</p>
	<p>What is the relationship between the central office and the Board of Education?</p>	<p>Central Office staff for the most part did not express opinions of the board. The concerns were relationships with the interim superintendent and the inability for the work to move forward in a positive direction.</p> <p>Board members expressed the freedom to contact individual central office members to have questions answered but indicated that sometimes they as board members did not know the questions to ask regarding finance particularly.</p> <p>It is evident that the board does not have a clear picture of the financial outlook of the district nor do they understand prioritizing of purchasing. In the absence of focused vision, mission, values and goals, many of the questions are generated by citizen concerns. The relationship is best characterized by responsive and reactionary.</p>

<p style="text-align: center;"><b>Deployment</b></p> <p style="text-align: center;">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)</p>	<p>How far into the organization is the understanding of how the district is governed?</p>	<p>Principals are aware of federal and state law and their role as principal. How the Breathitt County Board’s organization is related to day to day work is not obvious. Principals indicated that they feel supported from individuals in the central office (technology, child nutrition, DAC, special education particularly) but outstanding issues that do not seem to be addressed like textbooks, drug issues, need for feeling of board support for the work continue to make it difficult to get it all done.</p> <p>The principals and central office staff indicated that since May they had been having principals meetings district wide which has helped with the communication somewhat. Prior to the interim, no regular principal meetings were held to the point of being prohibited by the former superintendent.</p>
	<p>How do you know?</p>	<p>No one in any conversation indicated there was a clear path of communication throughout the system or if any message is consistent.</p> <p>Although principals and SBDM councils are trained, there is no monitoring mechanism to ensure that the councils are operating as designed.</p> <p>Principals indicate they frequently are communicated with through e-mails that tell them something they have to do from Central Office.</p> <p>There is evidence from interviews that the interim superintendent’s direction for curriculum and instruction (system-wide curriculum maps which she would provide) and the principal developed process of building by building processes based on teacher development are oppositional. KVEC has assisted with some of this work. This topic will be discussed further later in the report.</p>
<p style="text-align: center;"><b>Learning</b></p> <p style="text-align: center;">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;</p>	<p>How are changes in policy and administrative tasks communicated in the organization?</p>	<p>There is a videotaping/broadcast (Channel 9) system which is sporadically used to share complete Breathitt County Board meetings with all stakeholders. It was not clear from the interviews as to whether this is or is not happening. Strong opinions occurred on both sides. Some tapes were available.</p> <p>Many changes are shared in principals’ meetings. The changes in the central office roles and responsibilities to the understanding of the staff in schools have not occurred.</p>

<p>shares refinements and innovations with other work units and processes in the organization</p>		<p>There is a calling system for school messages in the district. They maintain a website. Many of the documents on it are not current.</p> <p>There is no evidence of a communication plan for the various groups of neither stakeholders nor the process for being heard to get changes made.</p>
	<p>How do they know that the policies and procedures are working?</p>	<p>From the interviews it appears that even though there may be defined procedures, there is little evidence that anyone other than the person who developed the procedure carries the work out.</p> <p>Frustrations were expressed by most all of the central office staff including the interim superintendent that people just do not deploy the procedures as they are designed. There is no evidence of monitoring processes being built in procedure designs.</p>
	<p>What are the processes in place to change the policies and procedures?</p>	<p>Through the interviews examiners were not able to discern exactly how things change through a process. In many cases change has come as the result of a disagreement. For example, the issue of who develops a school board agenda arose out of a particular issue between the interim superintendent and the board. The board was ready to begin a superintendent search while the interim superintendent did not believe the timing was right. Rather than resolve the issue, the board began a process to change the policy for who develops board agendas. Central Office personnel could not explain a process for getting an item on the board agenda for consideration. Board attorney advice is sometimes disregarded.</p> <p>The building principals make common decisions based on their work. The decisions may or may not include SBDM.</p>

<p><b>Integration</b></p> <p>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</p>	<p>What evidence is there that the policies and procedures work together for the goals of the school district/student achievement?</p>	<p>There is no clear evidence that the policies and procedures work together for the goals of the school district and student achievement.</p> <p>This is not to say that the people do not care about student achievement or love the schools.</p> <p>In heart wrenching detail we were told:          “I just think people lose sight of what it’s about.”          And another “ I’ve attended many graduations and every time I tear up because I think...we gave them our very best and the very best we had given them was not enough and they deserve better.”</p>
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<p><b>II. School Based Decision Making (SBDM)</b></p>	<p><b>Littleton, Edgett</b></p>	<p><b>Persons Interviewed :</b> District SBDM Coordinator/Trainer; 4 principals of schools with school based councils; 1 principal of school without council</p>
<p><b>Approach</b></p>	<p>Who is the leader of the SBDM system in the district?</p>	<p>A district SBDM coordinator/trainer has been identified but has minimal role beyond compliance training. There is no evidence of follow up, oversight or monitoring.</p>
	<p>What processes are in place to ensure SBDM operates appropriately?</p>	<p>There is no clear evidence that processes are in place to monitor or evaluate the effectiveness of the district’s SBDM Councils. This includes all compliance areas (e.g., schools having the required policies, following open meetings requirements) with the exception of the mandatory training.</p>
	<p>What documents and policies are in place to ensure SBDM is deployed?</p>	<p>Review of each school council’s minutes reflects that SBDM plays a minimal role in the decision-making process at the schools. Some minutes record a 30 minute or less meeting with limited discussion or decisions being collaboratively made.</p>

	Are there any legal exceptions to SBDM in the system?	<p>Highland-Turner Elementary School at the time of the audit was exempt from SBDM. The principal has processes in place for effective communication and collaboration with staff and community for instruction and student needs</p> <p>However, the evaluators express concern that if the principal should need to be replaced, without an established SBDM, the superintendent would select the principal and this may not be in the best interest of the sustainability of processes already in place.</p> <p>In spite of not having an SBDM, this school functions highly in communication and student based instruction.</p>
<b>Deployment</b>	How is the SBDM process deployed and how do you know it is working?	At this time, there are limited processes to ensure effective SBDM procedures at the schools. For example, there is evidence from interviews that at Marie Roberts-Caney ES council members may have served for 10+ years.
	Are goals established for the school?	With the exception of Highland Turner Elementary School (which is a non-SBDM school), goals and decisions for the school appear to be principal directed and some cases mandated by central office (e.g., hiring of certified staff).
	How are they measured?	There was no clear evidence there are processes in place to measure effectiveness of goals.
<b>Learning</b>	How do SBDMs use data and information to improve?	<p>All schools reported that they look at the state data.</p> <p>However, few mentioned other data that was reviewed (e.g., Think Link and survey data, EXPLORE and PLAN). Schools visited cited little or no SBDM involvement in data analysis for improvement strategies or decision making.</p>
<b>Integration</b>	What evidence is there that learning is shared throughout the organization?	Evidence is limited demonstrating learning shared among the staff at the individual schools, from school-to-school, or within the district. Instruction and staffing do not appear to be data driven. Most staffing decisions are based on historical practice rather than policy and protocol. However, as an example of a school making a staffing and instruction decision based on data, Highland-Turner ES is making scheduling adjustments at the time of the audit based on student achievement results (both statewide and benchmarking results) and staff input.

<p><b>III. Curriculum and Instruction</b></p>	<p><b>Lambert, Dukes</b></p>	<p><b>Persons Interviewed:</b> Supervisor of Instruction, Special Education Coordinator, Technology Coordinator, all Principals, High school and Middle School Counselors, Various teachers at BCHS; High School Guidance Counselor; Middle School Counselors; Special Education Teachers at the Middle and High School; Various General Education Teachers at the High School; Observed an FMD Classroom at the Middle School; and Spoke with Two Special Education Teachers at an Elementary School.</p>
<p><b>Approach</b></p>	<p>Who is the leader of the curriculum and instructional processes in the district?</p>	<p>Supervisor of Instruction. Current duties as outlined on the Breathitt County School District Organizational Chart are:</p> <ul style="list-style-type: none"> <li>• Certified/Classified Evaluation Coordinator</li> <li>• Professional Development Coordinator</li> <li>• Consolidated Plan Coordinator</li> <li>• KTIP</li> <li>• DAC</li> <li>• Curriculum</li> <li>• Textbooks</li> </ul> <p>Supervisor of Instruction has assumed various partial roles and responsibilities of other vacant positions.</p> <p>There are several areas that are not currently being addressed in regard to effectively impacting student learning, the development of curriculum and the delivery of instruction at the district level. Although attempts are evident to bridge the growing gaps in these areas, the focus of the Supervisor of Instruction(SI)has been to prioritize daily needs of the district and act on those accordingly.</p> <p>Special Education: The DoSE is the leader of the special education and preschool programs. He is acknowledged as having done a good job in decreasing the number of inappropriately identified special education students in the district, particularly in the preschool program. The focus is currently on compliance with IDEA and less to do with instruction of students.</p>

	<p>What processes are in place to ensure that core curriculum is aligned with state processes and horizontally aligned</p>	<p>Various curriculum maps and pacing guides have been posted to Breathitt County’s website showing an attempt to align the content with Kentucky Core Academic Standards. The availability of these essential documents is not consistent across grade levels or specific content areas. No evidence is available that indicates vertical alignment of the content standards throughout grade levels. The Supervisor of Instruction (SI) informed the audit team that she has provided some professional development to schools that involved the development of these plans in previous years.</p> <p>There is a void in communication of expectation regarding the implementation of these items. The lack of communication appears to be a result of constraints put in place by the former superintendent. The SI reports that she was prohibited by the former superintendent (prior to May 2012) to meet with principals in a collective group which had a negative impact on the implementation of common processes.</p> <p>Professional Development focused on the new standards has been minimal throughout the district. The Supervisor of Instruction’s responsibilities last year did not include organizing and implementing professional development. There is leadership understanding that Breathitt is behind other districts regarding providing support to teachers on the deconstruction and implementation of the standards.</p> <p>There is evidence that the interim superintendent had developed a CDIP to address these instructional concerns but there is no evidence of deployment of the plan.</p> <p>Although Professional Learning Communities were mentioned there is little to no evidence that they regularly occur with protocols and process improvement as a goal.</p> <p>Special Education: Many special education students are served under the co-teaching model. Some issues exist with the division of work between special education and general education teachers. Several special educators have been used as instructional assistants rather than as teachers who differentiate instruction. Accommodations are provided in separate setting when taking tests. Not all teachers who are engaged in co-teaching are trained. There is no evidence of objectives aligned with individual student learning goals</p>
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Gear Up evaluators indicated a lack of rigor in district programs. There is no evidence of deconstructed standards being developed and utilized by students who are not at grade level.

**Additional information about the effect that unfilled positions at the Central Office are having on students, including special education students:**

The three Central Office (CO) people interviewed seem to work well together. They were all doing many jobs that had been assigned to them, due to the district's inability to replace key staff within the CO. The three employees have undertaken many roles with no prior training.

A prime example is that the SI has been assigned responsibility for the Lead Report. She has never done the report and has not been provided training. The DoSE who does the special education Lead Report and the Technology Coordinator assisted the SI with getting the report done in a timely fashion.

No one is currently in leadership for Human Resources. Positions become vacant and are unable to be posted and filled.

Of special concern was the district's failure to have a person in the role of Director of Pupil Personnel (DPP). This is one of two positions that school districts are required by law to have.

There is little evidence that the role of DPP had been effective prior to the absence of the current associate superintendent taking medical leave. Attendance was monitored by the former superintendent.

The Technology Coordinator is performing the data collection role of DPP. Another staff person (one of the home instruction providers) goes to court when truancy charges are filed.

		<p>Failure to have the DPP role fulfilled has resulted in the following issues:</p> <ul style="list-style-type: none"> <li>• Students with numerous unexcused absences have been able to make-up school work without penalty. There are no clear processes for attendance and making up work. Poor practices such as a no fail policy without proper supports for it to be effective were cited. Attendance and its tracking is a concern.</li> </ul> <p>The emphasis has been placed on learning this year under the interim superintendent.</p> <ul style="list-style-type: none"> <li>• Inconsistent policies on make-up work were to allow students the number of days they've missed plus one day, to make up the work they've missed.</li> <li>• Inconsistent to unethical policies for calculating drop outs by using home school (deemed as private school under Kentucky law) as the classification</li> <li>• Inconsistent to unethical policies for placement of students with disabilities on homebound and use of homebound with little to no monitoring of work</li> <li>• Inconsistent to unethical use of attendance guidelines to allow students to participate in athletics whether regularly attending school or not</li> <li>• Inconsistent to unethical policies for attendance processes</li> </ul> <p>The three central office employees interviewed expressed sincere eagerness to have assistance from KDE to help the district get on-track. In spite of the district's current troubles, they seemed enthusiastic about working through problems for the good of the district's students.</p> <p>The DoSE in particular expressed his feeling that, when KDE has monitored in the past, it helped the DoSE make needed changes in special education, such as establishing eligibility guidelines for preschool students and ensuring that IDEA timelines are met.</p>
	<p>How do you measure effectiveness of these processes?</p>	<p>Curriculum and instruction processes, currently in their initial stages, do not reveal an adequate measurement of effectiveness. Lack of communication at school/district levels and the small population of teachers receiving network training have not had a significant impact on the effectiveness of these processes.</p> <p>Growth was noted by the SI and principals regarding teacher understanding of the standards yet this remains an area of great concern for the district personnel and staff. At least one elementary school grade level ability groups and it is not clear that there is a differentiation plan to assist in using data to get these students to grade level and that there is intentional intervention to facilitate this methodology's success.</p>

	<p>What processes are in place to ensure that rigorous, engaging instructional strategies are used in classrooms?</p>	<p>Processes in place to ensure rigorous, engaging instructional strategies were not evident throughout the district.</p> <p>Emphasis was placed on the attainment of numerous computer programs (Study Island, Think Link, Renaissance Place, Accelerated Reader, STAR Reading) and the utilization of these programs in all schools yet how these tools ensure rigorous and engaging instruction was unclear.</p> <p>Walk through procedures, lesson plan checks for aligned content, use of formative/summative assessments, and daily learning targets were mentioned by various principals in our group interview and confirmed by the SI. The implementation of these items through a systematic process is not evident throughout the district.</p> <p>District expectations could not be conveyed by teaching staff interviewed.</p> <p>General education teachers are required to create a binder of materials that shows evidence of teaching to the standards and student progress toward mastery of the standards. The binders included a KASC checklist for the corresponding grade level or content area, lesson plans, and sample formative/ summative assessments with high, medium and low student work. Student “rework” was also included. Systematic data collection processes necessary for the planning, instruction and differentiation of various level performance groups was not evident in the assessment binders at hand. These binders are reviewed quarterly by principals. Several binders were available for review by the audit team. The binders look to be a warehouse of documents rather than a tool that ensure rigorous, engaging instruction. Teachers noted that the binders were not a useful tool and that often items are just thrown together the day before they are due to be reviewed.</p> <p>District personnel and staff indicated lack of rigor as a main concern with instruction in the district.</p>
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	<p>What evidences are there of alternative programming for students</p>	<p>Two alternative schools were visited: Cadet Leadership Educational Program (CLEP) and Breathitt Day-Treatment Center. Both of the programs are DJJ and KECSAC monitored. Both schools are functioning as required by these organizations. Testing and assessment data drives their instruction and instruction is individualized for these students.</p>
	<p>What documents, policies, procedures are being used to ensure curriculum/ special education requirements are being met?</p>	<p>A district-wide organizational chart was produced. Many positions are vacant and have not been filled.</p> <p>The DoSE is responsible for numerous roles within the district, including IDEA-B Coordinator, School Health Coordinator, Preschool Coordinator and Section 504 Coordinator. He has responsibility for all related services providers (speech/language assistant, occupational therapist, physical therapist and school psychologist) as well as bus monitors, the school nurse, health services assistant and CBWTP coordinator.</p> <p><b>Assessment accommodations-</b> In providing training on assessment accommodations, the SI/ DAC uses the administrative code. The DoSE uses the State’s “Inclusion Document” for accommodations training. The DOSE and SI in her role as DAC provide three hours of training on accommodations to all staff.</p> <p><b>ARC chair training/IEP development</b> A six -hour training is provided by the DoSE to chairs of the district’s Admissions and Release Committees. This includes IEP development.</p> <p><b>Technology Plan-</b> The technology coordinator has developed a technology plan. It is reviewed with the district’s technology committee 1-2 times a year to determine if goals have been met.</p> <p><b>District Intervention Plan /Identification of students under IDEA</b> -The DoSE indicated there was a district intervention plan and provided copies to KDE. Staff must look at student attendance, behavior, and other factors prior to referral for special education. Information requested on the intervention plan includes state assessment scores, Think link, ESS, Rtl, and end of course assessment. These areas are to be considered prior to a student’s referral for special education services.</p>

		<p>The DoSE has trained on appropriate documentation surrounding identification of students with disabilities under IDEA. The DoSE and SI stated they have done “loads of PD” on research-based instruction.</p> <p><b>Rtl</b> - There is an Rtl procedure for preschool. The DoSE/preschool coordinator explained the procedure and produced documentation of the written policy.</p> <p>For K- 12, the DoSE mentioned that special education teachers go to general education classrooms to provide interventions for Tier 2. No mention was made of a district –wide Rtl process, although Rtl has a section on the district intervention plan.</p>
	<p>How do you measure effectiveness of these processes?</p>	<p><b>Accommodations training - There is clear anecdotal evidence through interviews that processes for determining proper accommodations for students are not understood.</b></p> <p><b>Some examples:</b></p> <ul style="list-style-type: none"> <li>• Students with disabilities are eligible for reader accommodation based on test scores and evaluations</li> <li>• The standard for a reader is how far below grade level the student is reading</li> <li>• One teacher’s caseload of 20 students had 17 with the reader accommodation</li> <li>• One special education teacher stated she had never had any student come to her class who was not at least 3 grade levels behind. All have readers</li> <li>• Paraphrasing assigned based on category of the disability</li> <li>• Once accommodations are determined, they keep the same ones throughout school career</li> <li>• Acceptance that special education students just don’t do well in CTE the reason being they have to use calculators which are not taught</li> <li>• Accommodations occurring in special education resource room rather than regular classroom</li> <li>• Scribing for multiple students at the same time</li> <li>• Students being eligible for alternate assessment based on disability indicating FMD are the only ones who qualify</li> <li>• Sometimes accommodations do not happen because there are not enough people</li> <li>• 504 plans were not provided to teachers at the beginning of 2012-13 school year. Students did not receive accommodations for at least a month.</li> </ul>

**ARC chair training/ IEP development-** There is clear evidence from interviews that some principals, even though participants in ARC chair trainings, do not understand special education sufficiently to ensure compliance and service to students. Misconceptions regarding role of the principal, who qualifies for pre-school, and how to educate students with significant disabilities who use wheelchairs were documented.

**District intervention plan** - The number of special education students, particularly in the area of Developmental Delay, has decreased over the past few years due to new processes started by the DoSE. The fact that special education referrals from school staff are not processed unless the intervention plan is filled out and documented, has had an effect on identification of students under IDEA.  
Copies of the district’s Intervention Plan were evident at the school level.

There was not a place on the intervention plan for the collection of formative data on an on-going basis.

**Rtl** – Although required by Kentucky’s special education regulations since 2007, there is no district – wide Rtl program. Teachers have a general Rtl plan but they are not analyzing data. Several principals cited Think link and Star reading as ways Rtl was provided to students; however, these programs require probes at 2 to 3 set times during the year. Formative instruction is not on-going, which means instruction is not changed or differentiated when the student does not demonstrate progress.

Misconceptions regarding Rtl are apparent through interviews with school leaders.

**Technology plan-** There is no clear process in place to ensure that all persons who need to be in attendance at technology committee meetings are informed.

Schools have their own technology plans that are not aligned with district plan.

**ILPs** – There is no clear process for ensuring that Individual Learning Plans are a vital part of the school processes as evidenced by teacher belief that ILPs are a counselor function. Three staff people have attended ILP training during 2012-13.

		<p>Data from Career Cruising indicate that not all seniors completed an ILP although there is a belief on site that all students have them.</p> <p>Currently, students have been required to go to the computer lab to fill out their ILPs. They were not given the opportunity to work on paper copies, which could provide them more time to reflect on the plan. Students' homeroom teachers were responsible for getting the ILP completed. This typically happened once during the year during one session in the computer lab. Instead of being a process for students to determine their post-school plans, it is a compliance event.</p> <p><b>ASVAB</b> - During the 2011-12 School Year, a notice about the ASVAB testing was placed on the district's master calendar. Five to six groups of high school students missed the test because the information was not conveyed.</p>
<b>Deployment</b>	What evidence that the processes identified are deployed with fidelity throughout the organization	The processes are not uniform or do not exist (in some schools), and therefore cannot be implemented with fidelity.
<b>Learning</b>	What processes are in place to use data and information to improve learning processes?	<p><b>State Required Assessment Data:</b> School data is shared with principals following release guidelines. SI stated that she has future plans to utilize KDE analysis tools to further disaggregate data with BACs. SI has relied on the BACs to break down data further and share with principals and teachers.</p> <p><b>District/school Required Assessment Data:</b> Various computer programs are in place to collect data at the school level (Think Link, Study Island, Accelerated Reader, CIITS, etc.) but no evidence was found regarding utilizing the data to improve learning processes. When asked about the planning for intervention and enrichment groups, principals and teachers did not communicate a common systematic process or specific data utilized. Federal Programing (Gear UP, AmeriCorps, UNITE) consultants/staff as well as Morehead students and student teachers were said to be helpful in providing support to struggling students.</p>

	What evidence is there that these are working	<p><b>State Required Assessment Data:</b> No systematic process was evident across the district.</p> <p><b>District/School Assessment Data:</b> Assessment binders are required of all general education teachers that are intended to show evidence of student learning and the implementation of KASC. Having reviewed several the binders as well as interviewing teachers about the effectiveness of this tool, all interviewee comments were related to the binders being a collection of plans, assessments, and content checklist that do not effectively impact student learning.</p> <p>No evidence was produced that special education teachers are required to collect formative data and utilize the data to improve instruction.</p>
	What data and information are used?	<p><b>State Required Assessment Data:</b> state testing results</p> <p><b>District/school Required Assessment Data:</b> Reading First, Think Link, STAR</p>
Integration	How is the learning from each of the levels used to improve the overall system	<p>Because of the numerous inconsistencies within the management framework of the district and lack of fundamental leadership, little evidence of learning across all levels within the systems was found. Currently, processes are being discussed regarding the need for successful systems which ensure children are receiving quality instruction throughout the district.</p> <p><b>All</b> interviewees requested help with getting the district back on track. Many dedicated teachers and district personnel are hoping that KDE can provide the needed guidance and support necessary to create a strong management system that ensures all students are prepared for the future.</p>

IV. Financial Management	<b>Barkley, Gardner</b>	<b>Persons Interviewed:</b> Contracted substitute for Superintendent; One Board Member; Two Principals; One SBDM Council Member; Finance Officer, Two Employees Acting as the Personnel Department; Transportation Director; and Special Education/Preschool Coordinator
<b>Approach</b>	Who is the leader of the financial management system in the district?	The leader of the financial management system is the Finance Officer. There is evidence that the Finance Officer is considered by others to be the leader of that system.
	What internal controls are in place to ensure the fidelity, efficiency, and accuracy of the financial records of the district?	<p>There is evidence of an adequate system of internal controls over purchasing, accounts payable, and payments. There appears to be adequate segregation of duties in the finance function.</p> <p>Barriers to the successful deployment of finance internal controls include the additional workload and responsibilities placed on the finance office as the staff have absorbed the duties of the vacant personnel director position and the vacant Superintendent’s secretary position. By combining the personnel and finance functions in one office there is significant risk of lack of appropriate segregation of duties although the finance office is mitigating those risks by reassigning job tasks as necessary.</p> <p>The atmosphere at the district has not encouraged professional skepticism and questioning of transactions to increase the fidelity, efficiency and accuracy of the financial records. There appear to be inadequate controls regarding the efficiency of certain spending units as evidenced in the transportation department, such as bus routing and van/private drivers, whereby the director has been unable to exercise authority over the functions.</p> <p>The Director of Pupil Personnel is directly involved in certain finance-related functions which are not properly managed since that individual has been off work on long-term sick leave; those duties have been delegated to several different employees with no single person taking responsibility.</p> <p>The evaluators express concern that the control for purchase order approval may need to be tightened to an amount less than \$2,500 as a result of the declining financial trend in the district; the personnel director and DPP duties are vital and need to be handled by qualified employees dedicated to those tasks; directors should have the authority to make decisions within their areas.</p>

	<p>What is the relationship between the Central Office finance staff, the Board of Education, other Central Office staff, and the schools?</p>	<p>The Board members and Superintendent are provided with monthly financial reports which illustrate the two previous years' actual results, the current year-to-date actual, the month-to-date actual, the total budget and the remaining budget for all revenues and expenditures at the function level.</p> <p>They are also provided with the listing of all checks to be disbursed for their approval prior to release. These reports are provided approximately four business days in advance of the Breathitt County Board meetings.</p> <p>The Board does not allow the Finance Officer to speak about the monthly financial reports given to the Board members or to discuss the financial condition of the district unless specific questions are raised and that rarely occurs.</p> <p>The Finance Officer does make presentations regarding the draft budget and the annual financial statements. The Finance Officer has delegated the ability to run financial reports to each of the program directors at the Central Office and to the school bookkeepers but does not provide any specific reports to them on a regular basis.</p> <p>Monthly reports detailing the amount of SBDM and federal funds spent and remaining budget should be provided to all principals. Monthly student activity fund reports should be provided to each sponsor at the school level by the bookkeeper.</p> <p>Principals interviewed place significant reliance regarding the financial condition of the school upon the school bookkeepers.</p> <p>The district does not utilize a Budget Committee which can cause disconnects between the district budget and the responsibility of each member of management.</p> <p>There is no process evident for training and budgeting among the stakeholders: Communication between the Finance Office and schools, SBDM councils, board members, and other management is limited and all parties would benefit from additional finance training, especially relating to reading finance reports and making decisions based on that information.</p>
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<p style="text-align: center;"><b>Deployment</b></p>	<p>How are the finance internal controls deployed throughout the district?</p>	<p>Board policies are in place for many finance-related functions but they are not routinely followed.</p> <p>A training gap exists for board members, SBDM council members, principals and other employees relating to finance. Communication from the district to the community regarding finance is lacking.</p> <p>A calendar committee exists to assist in the design of the school calendar, however the members have little input in the final outcome. A staffing policy exists but is not adhered to; it appears that the same staffing level is repeated year after year regardless of changes in enrollment on the staffing policy. The requisition process and timely bank reconciliations appear to be working.</p> <p>All fund raisers are approved by the board. Schools submit monthly financial reports and bank reconciliations. Recently the district began regular staff meetings and principals meetings.</p> <p>The evaluators express extreme concern that the internal controls are routinely circumvented or overridden by central office management and the board.</p>
	<p>How do you know?</p>	<p>There is evidence of inconsistent to unethical practices regarding finance in the areas of</p> <ul style="list-style-type: none"> <li>• Travel reimbursement policy is not followed; the full per diem is granted even if the employee is in travel status for only a portion of the day.</li> <li>• Employees feel the board policies are not adhered to, and exceptions have been made based on who is involved. Some program directors allow secretaries to sign on their behalf to approve financial transactions.</li> <li>• Staffing policy not followed based on Comparisons between the staffing policy and the actual personnel lists</li> <li>• Expenses are incurred and then expected to be paid by various funding sources not intended for those purposes, including the misuse of student activity funds for operational expenditures.</li> </ul>
<p style="text-align: center;"><b>Learning</b></p>	<p>What data and information are used to improve the financial standing of the district?</p>	<p>There does not appear to be a system in place whereby management considers financial information and necessary action is determined.</p> <p>The financial trend has been a \$200,000 decline in unrestricted fund balance over the past three years however that decline will be much greater in FY 13 due to the \$191,000 loss in SEEK funding, growing deficits from the day care, increased legal fees, reported overstaffing, neglected non-renewal notices, and possible negative financial effect on the food service fund as a result of implementing the Community Eligibility Option.</p>

		<p>There appears to be no procedures in place to determine available funding sources prior to taking personnel actions. A position inventory is not used to control, evaluate and monitor staffing levels. Day care fees appear to be too low with a 10% discount for district employees and the lack of adequate revenue causing routine deficits which must be covered by the general fund resulting in public education dollars subsidizing the day care for district employees and other citizens. Per diem travel rates appear to be unreasonably high.</p> <p>Overtime is not approved prior to the employee performing the work. The evaluators concur with the Finance Officer's concern that the district is headed for serious financial difficulty and potentially a deficit if purse strings are not tightened immediately.</p>
	<p>How do they know that the internal controls and other policies/procedures are working?</p>	<p>The annual independent auditors perform tests of internal controls, financial reporting, and compliance with laws and regulations, the results of which are reported to the board, federal agencies, KDE and the public.</p> <p>Only one deficiency was reported by the auditors in the FY 10 audit report (capital asset reconciliation) and no matters were reported in the FY 11 audit.</p> <p>There is evidence that many deficiencies exist in the internal control structure and the application of those controls during that time. Nonetheless, it appears management was aware that their actions circumvented or overrode internal controls.</p>
	<p>How is the Board informed of the financial status of the district and the impact of the budget on student performance?</p>	<p>There does not appear to be a procedure in place to tie financial decisions directly to student performance.</p> <p>The board is informed of the financial status of the district through monthly financial reports provided to them by the Finance Officer and by information presented regarding the budget and financial statements annually.</p> <p>The evaluators express concern that the board members lack the necessary knowledge to read, interpret and make decisions based on the financial reports; financial matters are not routinely discussed during the board meetings.</p>

<b>Integration</b>	What evidence is there that the policies and procedures work together for the goals of the school district/student achievement?	Due to the financial decline, it appears current policies and procedures are not working effectively to meet the financial goals of the district. Both the middle and high school principals indicated that student fees are very low to maximize student participation which is commendable.  The morale of the employees in the district is very low evidenced by the number of staff on extended sick leave.
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V. Personnel practices, including hiring and staffing	Barkley, Gardner, Littleton	<b>Persons Interviewed:</b> Contracted substitute for Superintendent; One Board Member; Two Principals; One SBDM Council Member; Finance Officer, Two Employees Acting as the Personnel Department; Transportation Director; and Special Education/Preschool Coordinator
<b>Approach</b>	Who is the leader in hiring and staffing for the district?	<p>There is no evidence of an effective leader in hiring and staffing for the district.</p> <p>Most hiring and determination of necessary positions has been managed by the superintendent in the past. The previous personnel director was moved to the preschool program in September.</p> <p>Currently, two members of the finance staff are assigned to process all personnel actions; neither employee possesses a bachelor's degree which makes them ineligible to fill the personnel director vacancy.</p> <p>Employees are being very mindful of the necessity to segregate the payroll and personnel functions, which has caused job duties to be realigned in the finance department.</p>
	What processes are in place to hire and train certified and classified staff?	<p>There are no formal written procedures in place for hiring and training certified or classified staff.</p> <p>Currently, one person posts job vacancies on the KDE website and another person posts job vacancies on the Breathitt County website and in the district after they receive information from the superintendent or principal that a vacancy will be filled.</p> <p>The job applications are collected and organized in the finance department then given to the superintendent. The superintendent forwards the applications to others for the interview process, if necessary. Many new hires appeared to be made directly by the superintendent, including teaching positions at the school level on occasion.</p> <p>After the hiring is complete, there appears to be an issue with ensuring all staff comes to the central office to complete the necessary paperwork for payroll to be accurately calculated.</p> <p>A new checklist has been developed by the finance staff for ensuring all payroll aspects of a new hire is complete. The payroll staff determines salaries by certification and years of experience.</p>

		<p>There is no apparent interview process for substitutes. There is no document listing the extended days for positions, nor a master list of positions currently approved by the board.</p> <p>The Board approves a salary schedule for extra service pay but does not approve the specific awards of extra service pay or extra days. Currently, the classified contracts do not include a salary.</p> <p>The evaluators are concerned with the legality of the contract without an agreed upon salary documented.</p>
	<p>What processes are in place to ensure fairness in staffing?</p>	<p>Supplemental staffing (through Federal Programs) seems to be created around class size reduction and not on school needs assessments.</p> <p>Staffing is not created from the school based allocations with extra staff requested by school needs assessments and allocated through section 7 funding. Staffing appears to be random and based on input from inappropriate sources, such as board members.</p> <p>Although board members indicated no involvement in personnel decisions, it appears board members may have been involved in directly assigning job duties to district staff.</p> <p>There are employees with more contract days than the supervisors assigned to manage their work.</p> <p>The district failed to notify employees of non-renewal last spring, so no employees were released. This has created an overstaffing situation, including instructional aides.</p> <p>The evaluators express concern that the overstaffing in the district may have a negative impact on the financial status of the district this year and non-renewal must be implemented in the spring.</p> <p>Also, there is a concern over similarly situated employees being treated differently in matters such as days worked per year and hours paid per day.</p>

<p style="text-align: center;"><b>Deployment</b></p>	<p>What evidence is there that the evidence mentioned in the approach are deployed in all staffing and hiring situations of the district?</p>	<p>The finance staff currently maintaining the personnel processes has developed and is using checklists to ensure all necessary information is gathered and documented for newly hired employees.</p> <p>There are situations where the necessary training for new bus drivers is delayed, causing a negative impact on students due to bus routes being disrupted.</p> <p>The board is given a listing of new hires, transfers and resignations monthly. Currently, a vacancy at the middle school cannot be filled due to the applications being in an office that has been closed. This has caused the hiring process to come to a halt.</p> <p>In the absence of a district leader due to legal issues, the district still needs to be able to function and complete the hiring process.</p> <p>In discussions with principals, the hiring process is working for school level employees they are allowed to hire themselves. Inconsistently SBDM councils are involved in the interview process; however, council minutes do not reflect that consultation has occurred at the school level.</p>
<p style="text-align: center;"><b>Learning</b></p>	<p>What measures of effectiveness are gathered to improve the hiring and staffing system especially in gap areas?</p>	<p>There is no evidence that district or school needs assessments are involved in any staffing or hiring decisions. There is also no evidence that student achievement is a consideration in the hiring and staffing process.</p>
<p style="text-align: center;"><b>Integration</b></p>	<p>What evidence is there that employees understand the hiring practices and that it is systematic?</p>	<p>The hiring practices in the past have been random and not following any written guidelines making it impossible for employees to understand the hiring and staffing process. Directors were not included in the hiring process for their own staff members on many occasions. Several principals expressed concerns that employees were being hired at the central office level and being assigned to the specific schools without SBDM consultation, or in some cases, without the principal's knowledge.</p>

	<p>What evidence is there that the staffing works with the goals of the school district /student achievement?</p>	<p>There is no clear evidence that the goals of the school district/student achievement have any impact on the hiring and staffing of the district.</p> <p>The evaluators have a concern that the hiring and staffing of the district is having a negative impact on the ability of the district to make necessary strides in student improvement and in the financial status of the district.</p>
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<b>VI. School food services management</b>	<b>Wagoner, Justice</b>	<b>Persons Interviewed:</b> Child Nutrition, Federal Programs Administrator/FRAM Coordinator, Administrator Assistant, Contracted substitute Superintendent and Financial Officer
<b>Approach</b>	<p>Who is the leader of the food services management system?</p>	<p>Currently the Food Service Director (FSD) is operating the National School Lunch Program (NSLP) in accordance with USDA and state requirements. The FSD has held that position for 7.5 years.</p> <p>The FSD works frequently managing data with the FRAM Coordinator and the Finance Officer as a result of Breathitt County participating in their first year of the Community Eligibility Option (CEO).</p>
	<p>What processes are in place to ensure that food services are efficiently and effectively maximized</p>	<p>The FSD is completing all required data collection and program monitoring requirements set forth by the USDA and the state in a timely and consistent basis.</p> <p>The issue that the reviewers identified however is that the data required for the CEO program, which is outside of the FSD's responsibility, is not being collected in a timely fashion due to staffing changes and a failure to follow the Department's guidance. The other finding was that there was</p>

no documentation from the Finance Officer on how the district charges the Food Service program for other direct costs such as utilities and trash removal.

The staffing changes are a result of the DPP, who was assigned the duties of the FRAM Coordinator at the beginning of the school year, taking a leave of absence and not reporting back to work yet. Therefore, the Interim Superintendent assigned the FSD's Administrator Assistant the duties of the FRAM Coordinator.

The reviewers verified that the Administrator Assistant has not been paid out of the NSLP program since that position is not working in FS and is now performing duties for the district outside of the NSLP per USDA regulation.

The Interim Superintendent then appointed the Federal Programs Administrator to the duties of the FRAM coordinator and that position is now responsible for the districts (not FS) responsibilities in the CEO program. The Administrator Assistant is now performing the duties of the DPP who has not returned from their leave of absence.

Since there has been a high degree of duties being reassigned, the duty of processing the alternate income form from households within the district has not been completed in a timely fashion resulting in a potential loss of SEEK funding.

In addition, the processes implemented by the FRAM coordinator to collect and process the alternate income forms for the CEO program did not follow the Kentucky Department of Education guidance which also resulted in the delay of the alternate income forms being processed.

Since the reviewers are not permitted by USDA regulations to review the alternate income forms, the reviewers could not determine the amount of money the district lost as a result of at risk students not being identified in a timely fashion. The reviewers were able to verify that to date; the district has been able to collect 95% of the alternate income forms that were sent to households.

The reviewers verified all costs to the program by looking at invoices and receipts and comparing them to MUNIS. The reviewers however were unable to verify how the district charges Food

		<p>Service for other direct costs such as utilities. Therefore, the reviewers could not determine if the district is charging Food Service for other direct costs in a manner that is consistent with USDA regulations.</p>
<p style="text-align: center;"><b>Deployment</b></p>	<p>What evidence is there that the processes that are designed are deployed with fidelity throughout the district?</p>	<p>The issues with the processing of the alternate income form have already been described.</p> <p>The FSD is responsible for administering the NSLP program. However, the reviewers noted that decisions were made by the Interim Superintendent without consulting with the FSD which affected the FSD's ability to administer the program.</p> <p>The Interim Superintendent required the FSD to begin using trays and metal utensils in the cafeterias in all schools. The FSD has been using disposable trays and utensils in all cafeterias for the past 6 years. The FSD on multiple occasions expressed concerns to the Interim Superintendent that switching to trays and metal utensils would be an unnecessary cost to the program. The Interim Superintendent required the FSD to order the trays. The reviewers did observe that the ordering of the trays, utensils and an increase in labor costs would occur and that two schools are currently already overstaffed based on Kentucky Department of Education staffing guidelines.</p> <p>This situation and related issues have resulted in a grievance being filed against the interim superintendent.</p> <p>The reviewers also noted that all cafeteria employees are on the same schedule per the request of the Interim Superintendent. The Division of School and Community Nutrition advises and trains FSDs to stagger staffing hours in order to have adequate staffing during peak hours of serving times and to adjust the staffing hours that reflect the menu that is being implemented. This was not occurring in Breathitt County which results in an undue expense in labor costs.</p> <p>The reviewers were able to verify that program reports are being submitted in a timely fashion by the FSD. The reviewers did note however that there is currently \$69,441.95 in unpaid meal charges by students. This is down from \$86,490.24 from April 2012. Under USDA regulations, these outstanding unpaid charges are considered bad debt and cannot be "rolled over" from year to year and must be paid at the end of each school year from non-federal funds.</p>

		<p>The FSD and her staff have worked diligently to collect these outstanding charges via phone calls and letters. The FSD did note as well that, with the help of the Interim Superintendent, they jointly sent a letter to the households that had outstanding charges and that effort greatly assisted Food Service with diminishing that debt.</p> <p>It was stressed to the FSD and the substitute Superintendent that the outstanding debt must be \$0 by the end of the school year, that the remaining outstanding debt cannot be “rolled over” into the next school year, and that federal funds cannot be used to pay the outstanding balance on the meal charges.</p>
<b>Learning</b>	<p>What measures of effectiveness are gathered to make improvements in food service management on a regular basis?</p>	<p>The FSD has documented meetings with all of the cafeteria managers on regular basis per USDA requirements. The FSD and all Food Service employees also acquire and maintain all necessary certifications and continuing educational requirements.</p> <p>It was noted by the reviewers that there is not a standard process to provide information about Food Service to the Board or the Superintendent. The FSD provided a detailed list to the reviewers on how to improve the Food Service department and communicate the current status of the Food Service department to the Superintendent and the Board. (See attached). <a href="#">Tabitha's plan.pdf</a> The reviewers reviewed the list and fully support the plan that the FSD will implement.</p>
Integration	<p>What impact has improvement made on other processes in the district?</p>	<p>Because there are not systematic processes for communication and plan deployment in the district there is no clear evidence that the improvements and plan that the FSD plans to implement will be followed by the Superintendent and the Board.</p>