

JCPS Final Corrective Action Plan

Area	KDE Recommendation & JCPS Action	
Planning	A. KRS 160.290 outlines the general roles and responsibilities of Board Members. However, interviews revealed there is involvement of Board Members in day-to-day management and operations of the district. A board protocol for ensuring proper training and alignment of responsibilities and roles of members must be enacted and monitored for improvement of board effectiveness.	Dennes
Planning	B. Examine and improve the alignment of central office work and personnel to achieve district goals and strategies. Alignment must include accountability for execution at all levels (e.g., Superintendent, Cabinet Members, Assistant Superintendents, middle level management, school administrators, teachers).	Dennes
Planning	C. While Vision 2020 (3.2.1, 3.2.2, 3.2.3, 3.2.4) focuses on communication with external partners including parents and business community, communicating the daily actions of the work of departments and work groups within the organization must flow from strategic (current state) to the operational level (desired state), ultimately all the way to the seat of a student. Create a formalized plan that focuses on two-way communication including horizontal and vertical internal communication which is harmonized across all processes and work groups to support organization-wide goals. As part of this formalized internal communication plan, there should be accountability for execution of this plan at all levels (e.g., superintendent, cabinet members, assistant superintendents, middle level management, school administrators, teachers).	Horton
Planning	D. Implement a systematic monitoring process to develop new and review existing policies while ensuring policies are effective at the board of education, district and school level. As part of this formalized process, there should be accountability for execution of this plan at all levels (e.g., Superintendent, Cabinet Members, Area Assistant Superintendents, middle level management, school administrators, teachers).	Dennes
Planning	E. While the CDIP contains the required Kentucky Board of Education (KBE) goals, the expansive nature of the plan inhibits full implementation of actionable steps to guide the day-to-day work. Create 30/60/90 day plans for each department to ensure the CDIP is being fully implemented.	Horton
Planning	F. The guiding principles of the JCPS Student Assignment Plan are choice, quality, diversity, predictability, stability and equity; however, based on interviews choice and diversity are championed above the other principles. Create a task force made up of shareholders (e.g., community members, parents, local officials, teachers, administrators, students) who are representative of the district demographics and geography to review the Student Assignment Plan to ensure opportunity, equity and access to all students.	Horton

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Operational Support	A. Provide KDE any change proposed by JCPS to a board policy or administrative procedure regarding facility maintenance and replacement	Dennes
Operational Support	B. It is recommended that the district analyze bus routes (including double runs) for the most efficient and effective solution to the transportation challenges within JCPS.	Raisor
Operational Support	C. It is recommended that the district consider the addition of bus monitors for the routes that have students with greater than average ride times.	Raisor
Operational Support	D. It is recommended that the transportation department provide more in-depth pupil management and de-escalation training over the course of the school year, rather than a one-time training in the summer. Additional strategies and techniques to utilize on the bus will lead to a decrease in disruptive behaviors and ensure the safety of all riders.	Raisor
Operational Support	E. It is recommended that the compound coordinators should have more input concerning driver routes so that the best choice can be assigned to each route.	Raisor
Operational Support	F. It is recommended the district review the discipline policy to tailor the bus behavior issues to appropriate consequences. Application of the policy should be consistent district wide for all drivers, parents, and students to have the same expectations.	Coleman
Operational Support	I. It is recommended that JCPS review their bus monitor allocation to determine the number of staff required to ensure student safety.	Raisor
Operational Support	J. It is recommended that the district clarify and communicate to school administrators the proper procedure for documenting 'bus' suspension versus 'school' suspension.	Coleman
Operational Support	K. It is recommended that periodic observations at the school should be done by JCPS transportation staff to review the loading and unloading procedures that impact student safety.	Raisor
Operational Support	L. It is recommended that maintenance or construction projects that impact parking or traffic patterns at the school are communicated to Central Office transportation staff in a timely manner for appropriate action.	Raisor
Operational Support	M. It is recommended that a business continuity plan for transportation management be developed in the event the C. B. Young, Jr. Service Center facility becomes unusable. Likewise, a business continuity plan is needed for each bus compound and its fleet should that location become unusable.	Dennes
Operational Support	N. It is recommended that the district implement a process to ensure the proper segregation of duties when it comes to custodial care of the kitchen and the lunchroom that will consistently support the use of indirect cost. Reorganization of both custodial and food service staff to the Central Office and removing the supervisory capacity of the building principal regarding those positions may eliminate any confusion about job responsibilities.	Raisor
Operational Support	O. It is recommended that the district address the corrective action plan required due to the USDA audit in March 2017 as a high priority for the district	Raisor

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Operational Support	P. It is recommended that the district develop a business continuity plan in the event the Central Kitchen facility becomes unusable.	Dennes
Financial	A. KDE recommends that the board members consider any and all additional revenue sources (e.g., nickel equivalent tax, utility tax) to address critical facility needs.	Hardin
Financial	B. KDE recommends board member training regarding the use of restricted district funds for the acquisition and holding of vacant real property.	Hardin
Financial	C. As required by board Policy 04.3111, KDE recommends that the board receives and approves a listing of invoices on the "Orders of the Treasurer Report" at monthly Board meetings.	Hardin
Financial	D. KDE recommends that the district develop a process that ensures all Principals allow the SBDM council members to assist with setting the budget priorities and ensure that all council members receive the monthly financial reports for all school funds.	Marshall
Financial	E. KDE recommends that the board review and approve long-term cell tower rental contracts, to avoid the contracts lapsing and rentals continuing without Board approval and appropriate corporation signatures.	Hardin
Financial	F. KDE recommends that the Payroll Department create a process to confirm that the amount on the bank file as transmitted to and received by the bank matches the total of the payroll at the district end.	Hardin
Financial	I. KDE recommends that the CAE investigate the presence of grant funds in school activity accounts.	Hardin
Financial	J. KDE recommends that the district separates the pupil attendance and Redbook training functions from the internal auditing function, utilizing different individuals to maintain proper segregation of duties.	Hardin
Financial	K. KDE recommends a process be established to review all outstanding checks past six months from the month of issue and addressed as appropriate.	Hardin
Financial	L. A business continuity plan for Financial Management should be developed in the event the VanHoose building becomes unusable.	Dennes
Financial - School	A. As evidenced by information gathered during school level interviews, communication is lacking from Central Office to school level personnel. Most Principals expressed the disadvantages of having Area Assistant Superintendents with 25 schools under each one. Communication is an area of much needed improvement. Transparency is a vital key to success and this is not observed in the JCPS network.	Horton
Financial - School	B. It is recommended that all schools utilize one bank account for school activity funds. If a school changes banks, any outstanding checks should be voided, written off in the EPES system, and reissued under the new account if the recipient is known. Accounts that aren't being utilized, should not remain open for extended amounts of time.	Hardin
Financial - School	C. To maintain accurate records of expenditures and authorization of expenditures, KDE recommends credit cards be safeguarded and kept under lock and key to protect against unauthorized use as outlined in Redbook procedures. A sign-in/sign-out sheet should also be maintained.	Hardin

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Financial - School	D. It is recommended that the district provide training to school level personnel for schools that receive funding through grants, so that someone at the school-level will have an in-depth understanding of the financial handling of grants and able to provide supporting documentation relating to the grant upon request during an external audit. The documentation surrounding grants may be maintained and controlled at the Central Office level; however, a basic understanding of the processes involved for the grant funded employees should exist at the school level. At least one member of the school personnel should be able to explain the procedures and policies that are in place to ensure grants are being properly allocated and accounted for per the constituents.	Hardin
Financial - School	E. It is recommended that the assistant Principals and teachers receive annual training on Redbook activities that govern school activities as it is not merely enough to educate bookkeepers in this area. For example, because multiple receipt forms begin in the classroom, it is important that teachers receive adequate training on multiple receipt procedures. Providing others with knowledge in this area will also help matters in the event a school bookkeeper should take leave unexpectedly, or during a replacement period if one leaves their place of employment.	Hardin
Financial - School	F. Dates should not be crossed out in ink on a purchase request form since this leaves room for questioning the validity of the documents being examined.	Hardin
Personnel Management	A. It is recommended that the Superintendent develop and implement a process to ensure that all Central Office employees are evaluated based on the duties described in their job descriptions.	Adams
Personnel Management	B. It is recommend that the Superintendent ensure that Supervisors (e.g., Cabinet members, Area Assistant Superintendents) are accurately evaluating their employees based on the duties described in their job descriptions	Adams
Personnel Management	C. It is recommended the HR department develop feedback mechanisms within its operating systems that will provide constructive data and information for continuous process improvement.	Adams
Personnel Management	D. It is recommended that employee files be routinely audited for complete information.	Adams
Personnel Management	E.The HR department has no business continuity plan in the event the VanHoose building is no longer available due to a disaster.	Dennes
Personnel Management	F. It is recommended that Central Office should provide opportunities for employees out in schools to participate in special events they hold in the main office.	Adams

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Instruction Management	<p>A. While Vision 2020 (3.2.1, 3.2.2, 3.2.3, 3.2.4) focuses on communication with external partners including parents and business community, communicating the daily actions of the work of departments and work groups within the organization must flow from strategic (current state) to the operation level (desired state), ultimately all the way to the seat of a student. Create a formalized plan that focuses on two-way communication including horizontal and vertical internal communication which is harmonized across all processes and work groups to support organization-wide goals. As part of this formalized internal communication plan, there should be accountability for execution of this plan at all levels (e.g., superintendent, cabinet members, assistant superintendents, middle level management, school administrators, teachers).</p>	Horton
Instruction Management	<p>B. While valid processes and protocols have been created around curriculum, instruction and assessment, they have not been consistently implemented with fidelity system-wide to ensure sustainability and repeatability that would result in continuous improvement.</p> <p>Along with inconsistent implementation, also lacking is a consistent process for measuring the effectiveness of policies/procedures to create change in policy and practice. Create a system with actionable, time-bound steps and person(s) responsible (e.g., 30/60/90 day plans) to monitor implementation of processes and measure their effectiveness at all levels.</p>	Dossett
Instruction Management	<p>C. As part of this system, there should be accountability for execution of this plan, as well as professional learning provided as needed, at all levels (e.g., superintendent, cabinet members, Area Assistant Superintendents, middle level management, school administrators, teachers) to ensure effectiveness.</p>	Dossett
CTE	<p>A. Provide KDE any change proposed by JCPS to a board policy or administrative procedure regarding career and technical education</p>	Coleman
CTE	<p>B. Inaccuracies in federal and state data reporting indicates noncompliance with Perkins, KRS 157.069, and College and Career Readiness Accountability, pursuant to KRS 158.6453. Areas of specific concern include discrepancies apparent in the TEDS data, student transcripts and schedules, student credit, and attendance data.</p>	Coleman
CTE	<p>C Inaccuracies in documentation of career pathways indicate pathways were incomplete, invalid, and inaccurate or were not followed, which indicates noncompliance with Perkins, KRS 157.069, and Accountability pursuant to KRS 158.6453. Documentation reviewed include master schedules, student transcripts and student schedules.</p>	Coleman
CTE	<p>D. School level CTE staff are not identified and/or identified staff do not have the knowledge and/or authority to implement the CTE program with fidelity, creating a system that provokes noncompliance with Perkins, KRS 157.069, and Accountability pursuant to KRS 158.6453, in the ways described immediately above. Evidence includes school and district level interviews as well as TEDS reports.</p>	Coleman

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CTE	E. The District CCR Coordinator should create a process that ensures that the benefits and the value of CTE are clearly communicated to all school leadership and become part of the district's culture.	Coleman
CTE	F. The District CCR Coordinator should collaborate with school leadership to ensure that all school staff understand the opportunities that CTE programs provide for all students. This message should also be shared regularly with students and parents.	Coleman
CTE	I. Establish a process to ensure that all district staff explore opportunities for integrating core academic curriculum and CTE curriculum to promote connections in student learning.	Coleman
CTE	J. Create written processes that address data collection and accuracy, finance, reviews of program standards by both the district and schools, and student testing.	Coleman
CTE	K. All high school counselors should be trained on Career and Technical Education to ensure they understand CTE pathway scheduling requirements.	Coleman
CTE	L. Create a process that ensures advisory councils meet the member requirements outlined in the Perkins Act and are an integral part of the decision making process in pathway development.	Coleman
CTE	M. District CTE leadership should ensure that the interests of students and the needs identified through Labor Market Information (LMI), specific needs identified by business and industry partners and specific data from the High School Feedback reports are addressed at all schools with fidelity.	Coleman
CTE	N. Establish a system by which the district CCR Director, school leadership and SBDM Councils are provided with all data and training necessary to make informed decisions relative to determining appropriate CTE course and pathway offerings.	Coleman
SCM	A. Provide KDE any change proposed by JCPS to a board policy or administrative procedure regarding physical restraint or seclusion (safe crisis management)	Coleman
SCM	B. There is a significant lack of understanding throughout the district regarding 704 KAR 7:160, Use of Physical Restraint and Seclusion in Public Schools. As a result of this lack of understanding, the district maintains policies and procedures regarding physical restraint and section that are inconsistent with the regulation (e.g. school resource officers not trained in positive behavioral supports and interventions). Interviews and observations indicate the prevalence of physical restraints such as mechanical, prone or supine restraints as well as unnecessary use of physical restraint and seclusion where the student's behavior did not pose an imminent danger of physical harm to self or others, in direct violation of 704 KAR 7:160.	Coleman
IDEA	A. Provide KDE any change proposed by JCPS to a board policy or administrative procedure regarding Special Education	New Chief

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IDEA	B. (IDEA #1) The district lacks clear, district-wide processes and coordinated systems of accurate collection, reporting, and utilization of student level behavior data. There is a clear disconnection between the collection of the data and its use for implementing a district-wide approach to student discipline, including the behavior supports necessary for successful implementation. Without appropriate positive behavior supports to address behaviors that impede learning, the district does not meet the standard required under 707 KAR 1:320, Section 5(2)(a).	Coleman
IDEA	C. (IDEA # 4)The continuum of educational settings in JCPS does not meet the standards established in the Individuals with Disabilities Education Act and is insufficient under 707 KAR 1:350.	New Chief
IDEA	D. (IDEA # 6) Educational placement decisions for students with disabilities are made to override the decisions made during the Admissions and Release Committee (ARC) process in violation of 707 KAR 1:320	New Chief
IDEA	F. (IDEA # 5) The district lacks a system to ensure disciplinary removals are consistent with the requirements of IDEA and 707 KAR 1:340, Sections 13 and 14. Interviews and observations indicate there is a lack of clarity as to the requirements under IDEA for disciplinary removals and resulting in inconsistency across the district.	Coleman
IDEA	I. (IDEA #10) The regional special education cooperative located in the district is unable to provide support and technical assistance to the district due to conflicting roles of cooperative employees. The cooperative's funds through IDE are not accountable for and appear to be mingled with other district funds. This is in violation of IDEA.	New Chief
IDEA	J. IDEA (Issue 2): Significant Disproportionality/Comprehensive Coordinated Early Intervening Services	Coleman
IDEA	K. IDEA (Issue 3): Positive Behavioral Interventions and Supports	Coleman
IDEA	L. IDEA (Issue 9): Physical Restraint and Seclusion	Coleman
Early Childhood	A. Provide KDE any change proposed by JCPS to a board policy or administrative procedure regarding Early Childhood	Coleman
Early Childhood	B. Implement KDE recommendations from the consolidated monitoring visit	Coleman