

Executive Summary: Management Audit of Menifee County Schools

In December 2014, the Kentucky Board of Education (KBE) approved Menifee County Schools as being designated a state-assisted district. In July 2015, the KBE approved Menifee County Schools as being designated a state-managed district.

In September 2018, an Audit Review Team conducted another management audit of Menifee County Schools. The purpose of the audit was to provide information and make recommendations to the commissioner and, ultimately, the KBE on whether state management should be extended in accordance with KRS 158.785. The Audit Review Team was comprised of 23 staff from the Kentucky Department of Education and, over the course of five days, met with 158 interviewees, including but not limited to the State Manager, all advisory board members, central office staff, principals, and school-based decision making council members.

Management Audit Pursuant to KRS 158.780, 158.785, and 703 KAR 3:205

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 as well as local board policies. The comprehensive management audit included an on-site review, investigation, and analysis of the governance and administration of Menifee County Schools and determined that a significant lack of a pattern of efficiency and effectiveness exists in the following areas:

Regulation – 703 KAR 3:205, Section 2	Audit Findings
(a) Planning	<p>Board members can speak to the numerous trainings they have received. However, it is not evident they have the capacity to govern without the State Manager’s oversight and guidance.</p> <p>There is little evidence to indicate that the information in the COLA documents directly provide support to the schools.</p> <p>Information shared at DLT meetings could be incorporated into other meetings.</p> <p>There is not a clear understanding of the purpose of the District Strategic Planning Team.</p>

	<p>There is a lack of consensus regarding the effectiveness and necessity of the Liaison meetings.</p> <p>Several advisory board members indicated a lack of in-depth understanding of financial data and the level of oversight the advisory board should utilize in managing district finances.</p> <p>The advisory board members have a limited knowledge of how or if policy changes are communicated to principals, teachers, parents, and the community.</p> <p>There is limited evidence that policies and procedures have been aligned to meet the individual needs of the schools and the district.</p>
(b) Operational Support	<p>The Facilities Director has no direct input into the budgeting process. Each building has been assigned a Building Repair Budget based on its age. Expenses are currently tracked in Munis. There is no formal analysis or tracking of maintenance and repair costs for efficiency and elimination of wasteful expenditures.</p>
(c) Fiscal Management	<p>The district over the past couple of years has obtained a few non-bus vehicles yet does not have a policy for usage of district vehicles.</p> <p>The district has staff who carry district paid cell phones, yet the Finance Officer was unaware of a written cellphone policy. District staff in general were not familiar with a cellphone policy. However, a review of the policies provided by the KSBA service,</p>

	<p>indicated a cell phone policy under Use of School Property 03.2321. Even though this policy authorizes the use of district owed cell phones, it does not prescribe how to manage personal usage.</p> <p>It is recommended that the district review the job responsibilities for the Director of Pupil Personnel and the allocation of time for those duties.</p> <p>District policies and procedures should be developed and implemented that provides a system for investigating, monitoring, and reporting complaints, both at the school level and the district level.</p> <p>The SBDM should meet on a continual basis and any cancelled meetings should be promptly rescheduled.</p> <p>Posted SBDM minutes are not consistently signed nor are they posted with the supporting documents.</p> <p>There is no evidence teachers are given training on school level finance. There is a need to educate additional staff who are considered essential in assisting the finance staff with school activities.</p>
(d) Personnel Administration	<p>Evaluations of classified staff are completed on a generic evaluation form which does not capture the job duties and expectations of a given staff position.</p> <p>The Employee Handbook is reviewed annually and updated as needed. As of the time of this audit (October, 2018), the handbook posted on the district website indicates it is for the 2017-18 school year. The district must have a process in place to review employee related documents in a</p>

	<p>timely manner and update the website accordingly.</p> <p>Department heads in both certified and classified areas are responsible for training staff. There was no documentation provided to ensure consistent tracking of attendance or completion of training activities.</p>
(e) Instructional Management	<p>Curriculum documents exist but it is unclear what processes are in place to measure the effectiveness of the curriculum and its impact on student achievement and academic performance.</p> <p>Instructional processes have been implemented across the district, but a system-wide analysis of impact on the system was not clearly evidenced.</p> <p>There is little evidence that the actionable steps are significantly impacting deficiencies in student learning.</p> <p>Written processes are not in place that address CTE data collection and accuracy, finance, review of program standards by both the district and schools, or student scheduling.</p> <p>There is not a process in place to ensure CTE advisory councils meet the requirements outlined in the Perkins Act.</p>

**Division of Learning Services Audit:**

In September 2018, a special education management audit was conducted in Menifee County by the Office of Teaching and Learning, specifically the Division of Learning Services (DLS). DLS was tasked with reviewing the district’s implementation of the Individuals with Disabilities Education Act (IDEA) and Positive Behavior Interventions and Supports (PBIS).

DLS conducted formal interviews with school employees, school administrators, the Director of Special Education, and parents. DLS also engaged in additional information discussions with staff and students as well as completed classroom walkthroughs and record reviews for 20

students with Individual Education Programs (IEPs). Further, prior to the on-site visit, DLS reviewed the following data: a master schedule for each school, special education policies and procedures, the district's website, district calendars, child count data, and removal data for students with disabilities.

Based on an analysis of data, the OSEEL has substantiated systemic findings of noncompliance under the IDEA. The data included a review of all requested information, a study of trends in the school district's specific categories of student discipline, including out-of-school removals and the evaluation and identification of students with disabilities.

Just as the KDE has general supervision responsibility under the IDEA to ensure all school districts within the state comply with the IDEA, so does Menifee County have the responsibility to require its schools to fulfill the requirements of IDEA. The special education administrator was found by the OSEEL to be supportive of the compliance requirements for students with disabilities. While systemic errors were found, the errors were procedural in nature and did not impact the provision of services to students with disabilities.

Some areas of strength identified during the onsite visit included:

- Related service provider data usage, particularly occupational and physical therapists, was consistent and clear. Reports aligned to the data included in student due process files.
- Organization of student due process files facilitated compliance and allowed access to historical documents if needed.
- Specially designed instruction and supplemental aids and services were individualized
- Evidence of systemic efforts to fade accommodations for statewide testing was found

Opportunities for growth identified during the onsite visit included:

- Some adverse effect statements contain the word "may" or "likely" which are inconclusive statements and do not support evidence of an adverse effect.
- Progress monitoring was not readily available within student due process files, but was available later upon request.
- Documentation of ARC discussion on placement was not clearly written and lacked individualization.
- Co-teaching was identified as a special education delivery model in many student due process files. However, staff were not able to demonstrate an understanding of the co-teaching model.

However, because OSEEL discovered procedural IDEA violations, an IDEA Corrective Action Plan (CAP) is required pursuant to 707 KAR 1:380, Section 1. The district and the OSEEL will work together to develop a CAP to set out activities that address the root causes of the noncompliance at the systems level.

## **Career and Technical Education**

Several concerns were discovered during the management audit with regard to Career and Technical Education (CTE), including:

- A CTE Coordinator needs to be identified and should receive TEDS training.
- An additional person should also receive TEDS training.
- There is not a process in place to ensure that the CTE Coordinator and the additional person monitor the data as required.
- Processes are not in place that address data collection, data accuracy, finance and review of program standards by both the district and school.
- District and School Leadership do not have a clear understanding of career pathways and cannot provide effective guidance to ensure effective program implementation.
- Students taking CTE courses are not necessarily enrolled in pathways.

## **Conclusions**

As a result of analysis of all reviewed Kentucky Department of Education data, Menifee County Schools' data, and information gathered during the comprehensive management audit which occurred September 24-28, 2018, and ongoing oversight of the district while under state management it is the recommendation of the Commissioner that Menifee County Schools transition into state assistance, pursuant to KRS 158.785(8).