

**Menifee Management Audit Report**

**Per KRS 158.785**

**Prepared for**

**Kentucky Commissioner Dr. Wayne Lewis**

**Kentucky Department of Education Staff**

**April 2019**

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April 2019

## Executive Summary

<b>School District</b>	Menifee County Public Schools	
<b>Superintendent</b>	Tim Spencer, State Manager	
<b>Board Chair</b>	April Smith	
<b>Date of On Site Visit</b>	September 24-28	Number of interviews: 158
<b>Management Audit Team</b>	Kelly Foster, Whitney Crowe, Leesa Moman, Susan Greer, Tim Godbey, Kevin Gay, Kay Kennedy, Curtis Higgins, Jeanne Crowe, Crystal Higgins, Steven Abbot, Todd Tucker, Kathryn Embree-Cleveland, Marcus Highland, Steve Lyles, Jackie Chism, Helen Jones, Karla Tipton, Kim Cornett, Nicole Vanover, Veronica Sullivan, Sylvia Starkey, Roger Kerns	
<b>Area of Review</b>	<b>Recommendation</b>	<b>Evidence</b>
Planning	<p>Evaluate and align central office work and job responsibilities of personnel to ensure the necessary supports are provided to the schools. When reviewing job responsibilities of personnel an intentional focus must be placed on work load and employee capacity and skill set. Implement a systematic monitoring process to review the alignment of central work and personnel job responsibilities. Alignment must include clear accountability for execution (e.g., central office staff).</p> <p>Review and determine the effectiveness and of the structure of district level and school level support meetings (e.g., COLA, DLT, DSPT, Liaison, and Principal Cadre). Create a structure that streamlines the efficiency and effectiveness of support meetings to ensure the goals of the schools and district are being supported. The necessity of support meetings should be clear.</p> <p>In order to meet the individualized needs of the schools in the district, central office staff and the advisory board need to move from a compliance mindset to one of</p>	<p>Persons Interviewed: State Manager, All Advisory Board Members, Instructional Supervisor, Federal Programs Coordinator, School Based Decision Making (SBDM) Coordinator, Professional Development Coordinator, Community Education Coordinator, 21<sup>st</sup> Century Coordinator, School Psychologist, District Assessment Coordinator, Special Education Director, Gifted &amp; Talented Coordinator, SBDM Council Members, All School Principals</p> <p>Documents Reviewed: Advisory board Policies, Advisory board Meeting Minutes, Advisory board Meeting Agendas, 30-60-90 Day Plans, Comprehensive District Improvement Plan (CDIP), Comprehensive School Improvement Plans, School Based Decision (SBDM) Agendas, SBDM Minutes, SBDM Bylaws and Policies, Job Descriptions, Central Office Organizational Chart, Instructional Professional Observation Form (IPOF), District Leadership Team (DLT) Agendas and Minutes, District Instructional Leadership Team (DILT) Agenda and Minutes, Central Office Leadership Accountability Team (COLA) Documents, School Schedules, District and School Websites, Social Media, Communication Plan,</p>

	<p>continuous improvement. Decisions made should be based on research, school level data, and community needs and should be flexible to the changing needs of the district.</p>	
<p><b>Operational Support: Food Services, Transportation, Facilities</b></p>	<p><b>Recommendations for improvement in Food Services:</b></p> <p>It is recommended that the job description and corresponding duties of the food service director be reviewed and that the position be the sole responsibility of a single staff member without the duties of any other jobs. The National School Lunch Program (NSLP) is a federal program that must meet federal compliance requirements as well as additional state compliance in several areas. The food service budget is sustainable and would support a full-time director’s salary which would allow for better oversight of the Child Nutrition Program.</p> <p>It is recommended that a menu planner develop a consistent unified menu for the district. The district menu should be communicated clearly to all stakeholders. Deviations from the menu should be communicated by the director to all who need to know, and any deviations made by site managers should be clearly communicated and explained to the director.</p> <p>It is recommended that each site have a clearly defined manager role in place to ensure that implementation of the program processes and procedures, as communicated by the</p>	<p>Persons Interviewed for Food Services: State Manager; Food Service Director; Head Cook, Botts Elementary; Principal, Botts Elementary; Head Cook, Menifee High School; Interim Principal, Menifee High School; ERL, Menifee High School; Head Cook, Menifee Elementary</p> <p>Documents Reviewed:  Detailed expenditure report 17-18, Current list of employees, Meal participation percentages by site, Meals per labor hour worksheet, Period 13 balance sheet, Free and Reduced Price Policy Statement, Local Wellness Policy, Training plan/documentation of trainings provided Production Records, On-Site Monitor Review Forms, School Menus and standardized recipes, Daily Meal Counts, Food Safety Plan</p>

director, are being implemented correctly in accordance with federal and state requirements and guidance.

It is recommended that the district create a “Food Service Policy Development and Communication Plan”. It is recommended that all food service staff receive adequate training on a consistent basis on implementation of the procedures.

The district must implement a continuous monitoring plan to ensure proper understanding of the food service program is in place.

It is recommended that a comprehensive staff training plan on program requirements and district implementation of those requirements be developed, implemented, and monitored.

**Recommendations for improvement in Transportation:**

It is recommended that the district review the job responsibilities for the Transportation Director and the allocation of time for those duties.

It is recommended that the district develop specific objectives for annual training that reflect employee needs.

It is recommended that district include actual miles traveled (with or without students) when analyzing cost efficiencies.

It is recommended that the district inventory all tools, parts, and supplies in the Transportation Department and

Persons Interviewed for Transportation:  
Transportation Director; Vehicle Maintenance Inspector; Principal, Botts Elementary; Interim Principal, Menifee County High School

Documents reviewed:  
2018-19 Pupil Transportation Manual, Uniform Code of Student Conduct Handbook 2018-19, District Policies, 2018 Inspection and Maintenance Records

	<p>manage them from the central garage facility.</p> <p>It is recommended that the Transportation Director periodically observe loading/unloading procedures at each school and implement changes as necessary to improve student safety.</p> <p><b>Recommendations for improvement in Facilities:</b></p> <p>It is recommended the district review the responsibilities of the Facilities Director and the allocation of time for those duties.</p> <p>It is recommended the district move with haste to establish the schedule and funding for the new school construction and the configuration of the grade structure in each building.</p> <p>It is recommended that this district utilize a building maintenance software program to track costs, purchase orders, and work orders.</p>	<p>Persons Interviewed for Facilities: State Manager; Facilities Director; Interim Principal, Menifee County High School; ERL, Menifee County High School; Custodian, Menifee County High School; Principal, Menifee Elementary School; Principal, Botts Elementary; Custodian, Botts Elementary</p> <p>Documents reviewed: District’s Policy/Procedure manual, Chapter 05 School Facilities, 2017 Menifee County District Facility Plan (DFP), MUNIS Repair &amp; Maintenance Budgets, Facility Flood Insurance Policies, Board Meeting Minutes, Current district Capital Construction Project submittals, Maintenance and Cleaning Schedules</p>
<p><b>Operational Support: Financial Management</b></p>	<p><b>Recommendations for improvement at the district level:</b></p> <p>It is recommended the district develop written policies and procedures for the usage of district vehicles.</p> <p>It is recommended the district amend the existing policy to provide a procedure for personal cellphone</p>	<p>Persons Interviewed at District Level: State Manager; Finance Officer; Community Outreach Director; Head Technology Technician</p> <p>Documents Reviewed: Expense reimbursement policy, Disaster Recovery/Business Continuity plan, Bank Reconciliations – most recent 3 months, Signed Warrant Proof Report, AP Disbursement Journal, Investment Policy and Depository Bid Document,</p>

	<p>usage and communicate the policy to district staff.</p> <p>It is recommended that the District policies and procedures should be developed and implemented that provides a system for investigating, monitoring, and reporting complaints (either at the school level or the district level).</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><b>Recommendations for improvement at the school level:</b></p> <p>It is recommended that all monthly SBDM minutes contain signatures of the council members, in addition to any supporting documentation presented during the meeting. All the current fiscal year, and previous fiscal year minutes along with any supporting documentation should be posted on the website.</p> <p>The SBDM should meet on a continual basis and any cancelled meetings should be promptly rescheduled.</p> <p>It is recommended that additional staff such as teachers, are included in the Redbook training, as they are actively involved with the initiation of required Redbook forms such as Multiple Receipts Forms, in addition to ticket sales, as they may also assume the role of ticket taker in the school's extramural activities.</p>	<p>Training Hours Document for Finance Officer, Purchasing Policies/procedures, Model Procurement Policy</p> <p>Persons Interviewed at School Level: Principal, Botts Elementary; Educational Recovery Leader, Menifee County High School; Interim Principal, Menifee County High School; Bookkeeper, all schools</p> <p>Documents reviewed: SBDM minutes, Transfer Forms, Multiple Receipt Forms, Invoices, purchase orders, and supporting documentation, Copies of bank statements Management Comments and audit report for 2016/2017, Requisition and report of ticket sales, Bookkeeper Job Description</p>
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<p><b>Operational Support: Personnel Administration</b></p>	<p><b>Recommendations for improvement:</b>  It is recommended that the district develop and implement evaluation instruments that accurately reflect the job duties and performance expectations for all approved positions.</p> <p>It is recommended that the district develop a process to review and amend the Employee Handbook in a timely manner.</p> <p>It is recommended that the district develop and implement procedures to track professional development and pertinent training for all employees.</p>	<p>Persons Interviewed:  State Manager; Finance Officer; Administrative Assistant to Superintendent</p> <p>Documents reviewed:  Personnel File folders, Classified Evaluation form, Job descriptions for all current positions, Employee Handbook, District Policies, Current Organization Chart, Board Policies, Chapter 3 Personnel</p>
<p><b>Instructional Management</b></p>	<p><b>Recommendations for Improvement:</b></p> <p>It is recommended that the district develop and implement a rigorous Tier III intervention system, at all grade levels within the district, to address the specific learning needs of students as identified through a comprehensive data analysis process.</p> <p>It is recommended that the district review and align school improvement planning processes to eliminate unnecessary and redundant pieces of work at all levels of the system. Clearly define roles and responsibilities of key instructional</p>	<p>Persons Interviewed:  Classroom Teachers, State Manager, Educational Recovery Director, Instructional Supervisor, District Assessment Coordinator, Director of Special Education, Director of Technology, Instructional Coaches, Parent, School Counselor, Principals, Education Recovery Staff, GEAR-UP Coordinator, Instructional Assistants</p> <p>Documents Reviewed:  CSIP, CDIP, Alternative School Documents, Certified Evaluation Plan, 30-60-90 day plan, monitoring forms, curriculum documents, district RtI procedures and documents, Living calendar, Three year planning document, Instructional Policies, Observation documents/walkthrough documents, Professional Learning Community documents, Data Analysis documents, quarterly reports, professional development documents,</p>

	<p>leaders to maintain their focus on improving teaching and learning.</p> <p>It is recommended that the district develop a clear system of district expectations for professional learning and supports for special education and regular education teachers teaching in a collaborative setting and for other safety nets for special education students that goes well beyond compliance issues into teaching and learning.</p> <p>CTE</p> <p>It is recommended the district identify a CTE Coordinator and an additional person to receive TEDS training.</p> <p>It is recommended the district develop a process to ensure that the CTE Coordinator and the additional person monitor the data as required.</p> <p>It is recommended the district develop, implement and monitor processes that address data collection, data accuracy, finance and review of program standards by both the district and school.</p> <p>It is recommended the district develop, implement and monitor 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 for the program.</p> <p>It is recommended the district and School Leadership must develop an understanding of career pathways, and provide guidance to ensure effective program implementation.</p> <p>It is recommended the district develop a process that ensures all students</p>	<p>principal meeting agendas and minutes, superintendent communication documents, district and school website.</p> <p>Persons Interviewed: Educational Recovery Leader, High School Guidance Counselor, Agriculture Teacher, Family and Consumer Science Teacher</p> <p>Documents Reviewed: Pathway documents, master schedules, invoices, and student transcripts.</p>
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	<p>enrolled in CTE pathways are moving toward transition readiness, not just taking courses.</p> <p>It is recommended the district reduce the number of Family and Consumer Science pathway offerings in order to strengthen the Culinary Pathway.</p> <p>It is recommended the district review the opportunity to offer Family Consumer Science Essentials for 8<sup>th</sup> graders.</p> <p>It is recommended the district review the opportunity to offer Money Skills as a fourth math credit to build the program.</p>	
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**Conclusions:** As a result of analysis of all reviewed Kentucky Department of Education data, Menifee County Schools’ data, information gathered during the onsite management audit which occurred September 24-28, and ongoing oversight of the district while under state management, it is the recommendation of the Commissioner that Menifee County Schools that the district be placed in state assistance, pursuant to KRS 158.785.

Pursuant to 703 KAR 3:205(2) (2), the comprehensive audit included an investigation of the district’s compliance with state and federal statutes and administrative regulations and local board policies. Deficiencies identified and established may constitute a pattern of a significant lack of effectiveness and efficiency in the governance and administration of the school district.

<b>Summary of Findings</b>	
<b>Regulation 703 KAR 3:205, Section 2 (a)</b>	<b>Findings</b>
<p><b>(a) Planning</b> – failure to develop, adopt and implement planning processes that allow for public review and timely action by the board and administration regarding management of the administrative and business activities of the school district and of the management of the instructional program</p>	<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>
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**(b) Operational support** - failure to provide the operational support services required to operate an efficient and effective school system including:

**1. Maintenance and operation of the physical plants** - failure of the district to maintain school building cleanliness and safety including:

<b>Regulation 703 KAR 3:205, Section 2 (b)</b>	<b>Findings</b>
Failure to develop and maintain an accurate record of the maintenance needs and expenditures	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.
Failure to budget and expend funds necessary to maintain the physical plant	No Finding.
Failure to employ maintenance and operation staff who provide clean and safe school buildings.	No Finding.

Failure to make efficient use of personnel as indicated by excessive staffing when compared to school districts of similar size and funding.	The Facilities Director is also the Food Service Director and allocates 40% of his time to facilities. There is minimal oversight of school level custodial staff.
Failure to make repairs that prevent costly and unnecessary maintenance expenditures.	No Finding.
Failure to ensure that existing facilities are adequately insured	No Finding.
2. Facility construction - failure to manage a school facility construction program that is in compliance with 702 KAR Chapter 4 and is planned, executed, and completed to ensure that public funds are expended in a responsible manner including a failure to:	
<b>Regulation 703 KAR 3:205, Section 2 (b)</b>	<b>Findings</b>
Develop and implement a planning process for identifying the need for new or improved facilities	No Findings.
Maintain an up-to-date facility survey or ensure that regulatory approvals are secured.	No Finding.
Develop and implement plans to receive the allowable benefit from School Facilities Construction Commission.	No Finding.
Follow proper bidding requirements and develop and maintain accurate records of expenditures and authorization of expenditures on school construction projects	No Finding.
Institute an administrative oversight process to ensure that facility construction activities are efficient and accountable for both local and state funds.	The district has not established the schedule and funding for the new school construction and the configuration of the grade structure in each building.
3. Maintenance and operation of the transportation system to provide and maintain an efficient transportation system including a failure to:	
<b>Regulation 703 KAR 3:205, Section 2 (b)</b>	<b>Findings</b>
Provide training for personnel responsible for the safe transportation of children in accordance with Kentucky Board of Education administrative regulations	The Transportation Director allocates 70% of his time for those duties. This impacts the director's ability to

	<p>review employee feedback, data analysis for routing, and other supervisory duties.</p> <p>Employees expressed a need for more hands-on training.</p> <p>Supervisory staff were not adequately positioned during loading/unloading procedures at the schools.</p>
Develop and implement policies and procedures regarding the use of district-owned vehicles	It is recommended the district develop written policies and procedures for the usage of district vehicles.
Purchase and maintain equipment to safely and efficiently transport children to school	It is recommended that the district inventory all tools, parts, and supplies in the Transportation Department and manage them from the central garage facility.
Establish transportation routes that minimize public expenditure and time children spend in route to school.	There is no evidence that the district uses mileage data to inform development of bus routes
Follow bidding requirements for the purchase of equipment and materials necessary to conduct the school's transportation program.	No Finding.
4.School food services - failure to develop an efficient system of school food services including a failure to:	
<b>Regulation 703 KAR 3:205, Section 2 (b)</b>	<b>Findings</b>
Develop and maintain an accurate record of school expenditures.	The Food Service Director is also the Facilities Director, with 60% of his time allocated to Food Service and the remaining 40% to Facilities. There is a systemic lack of communication and program oversight throughout the food service operation which is resulting in noncompliance with the federal regulations of the National School Lunch Program. The director often referenced time as a constraint as to why issues of noncompliance were not addressed or discovered.
Utilize federal and local resources to operate a nutritious program in a cost effective manner.	All school menus do not provide students with choice and include student preference in menu planning. There are no clear standardized recipes that all sites follow and understand how those recipes credit towards the meal pattern. There is inadequate oversight and monitoring in place to ensure that the recipes are being followed accordingly and that production records and food usage are documented correctly. The district menus are not monitored for inventory fluctuations nor

	for forecasting to ensure adequate ordering and cost savings.
Employ school food service staff who provide meals in accordance With federal and state guidelines.	<p>Deployment of any operational processes to the sites is negatively impacted since there is no one on staff at each school site whose job description can hold that person accountable to implement the process. At each school site there is not a staff person with the given job responsibility of program management and the requisite documentation and reporting.</p> <p>There is not a continuous monitoring plan to ensure proper understanding is in place. If a lack of understanding is found through monitoring, then retraining must occur. Even if understanding is occurring, monitoring is still crucial to ensuring consistent application of the programs and goal setting for improvements.</p> <p>Staff do not have a clear understanding of program processes and procedures. It is essential to invest in staff program knowledge to aid in meeting compliance and ensuring that the program operates at its highest standards.</p>
Make efficient use of personnel as indicate by excessive staffing when compared to school districts of similar size and funding	No Finding.
<p><b>(c) Fiscal Management – District Level</b> failure to perform the appropriate planning, budgeting, fund management, and accounting responsibilities required for the fiscal management of the school district including a failure to:</p>	
<b>Regulation 703 KAR 3:205, Section 2 (c)</b>	<b>Findings</b>
Assess the need for expenditures. Recommend use of available funds according to an established set of priorities.	<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 owned 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>
Maintain accurate records of expenditures and authorization of expenditures as required for auditing purposes	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.
Comply with purchasing requirements applicable to school districts.	No Finding.
Implement investment policies to ensure that all public funds are invested safely and productively.	No Finding.
<p><b>(c) Fiscal Management –School Level-</b> failure to perform the appropriate planning, budgeting, fund management, and accounting responsibilities required for the fiscal management of the school including a failure to:</p>	
<b>Regulation 703 KAR 3:205, Section 2 (c)</b>	<b>Findings</b>
Assess the need for expenditures.	<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>
Recommend use of available funds according to an established set of priorities.	No Finding.
Maintain accurate records of expenditures and authorization of expenditures as required for auditing purposes	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.
Comply with purchasing requirements applicable to school districts.	No Finding.
Implement investment policies to ensure that all public funds are invested safely and productively.	No Finding.



**(d) Personnel administration** - failure to ensure school district staff are prepared to perform the required professional and staff responsibilities in an effective and efficient manner, including a failure to:

<b>Regulation 703 KAR 3:205, Section 2 (d)</b>	<b>Findings</b>
Develop and implement employment practices and procedures that ensure the selection and placement of the most qualified personnel.	No Finding.
Train and evaluate the professional staff of the district as required by applicable laws.	<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 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** - failure to develop and maintain district-level instructional policy including a failure to:

<b>Regulation 703 KAR 3:205, Section 2 (e)</b>	<b>Findings</b>
Maintain a curriculum consistent with 703 KAR 4:060 and applicable laws.	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.
Provide the resources necessary to support the instructional program.	<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</p>

	<p>program standards by both the district and schools, or student scheduling.</p>
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There is not a process in place to ensure CTE advisory councils meet the requirements outlined in the Perkins Act.

## Management Audit Methodology:

The management audit team utilizes both qualitative and quantitative data collected from the district both onsite and offsite in the analysis of district and school planning, governance, operations (e.g. financial, transportation, facilities, personnel) and instructional management. The audit team uses the following guideposts in review of the data:

- **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
- **DEPLOYMENT:** how the approach is applied in addressing values relevant and important to the organization (performance goals); if the approach is applied consistently and is it executed by all the appropriate work units (offices, departments)
- **LEARNING:** how the organization refines the approach through cycles of evaluation and improvement (over time and several data points); encourages breakthrough change to approach through innovation; shares refinements and innovations with other work units and processes in the organization
- **INTEGRATION:** The approach is aligned with the organizational needs identified in the CDIP or CSIP or KBE goals and other departments; the measures, information and improvement systems are complementary across processes and work units; the plans processes, results, analyses, learning and actions are harmonized across processes and work units to support organization-wide goals

# Audit Report

## I. PLANNING

- a. **Team Members:** Kelly Foster, Whitney Crowe, Leesa Moman
- b. **Persons Interviewed:** Advisory board policies, Advisory board Meeting Minutes, Advisory board Meeting Agendas, 30-60-90 Day Plans, Comprehensive District Improvement Plan, Comprehensive School Improvement Plans, SBDM Agendas, SBDM Minutes, SBDM Bylaws and Policies, Job Descriptions, Organizational Chart, Instructional Professional Observation Form (IPOF), Central Office Leadership Accountability Team (COLA) Documents, School Schedules, Survey Data, District and School Websites, Social Media, Communication Plan

### **APPROACH:**

#### **Who is the leader of the governance and management system?**

The advisory board is made up of 5 members. The range of membership at the time of the audit spans 9 months to 8 years. In July 2015 a State Manager was placed in the district by the Commissioner. 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. For example, the advisory board members repeatedly stated that the State Manager's leadership was needed to continue the growth of the district and to complete the new school construction project.

Based on interviews and observations it is obvious that the State Manager continues to be needed to set direction and make day-to-day decisions in the district. Interviews indicated there is an uneasiness about any future leadership changes.

#### **What documents, policies, procedures indicate how the schools are governed?**

The advisory board has adopted the Kentucky School Board Association model policies for administration and school governance however there is little to no evidence that the advisory board strategically adopts policies based on the needs of the district. Central Office staff indicated that the CDIP and the 30-60-90 day plans help provide direction. The COLA Team meeting was established to ensure that all central office administrators are aware of the priorities for the week. There is little evidence to indicate that the information in the COLA documents directly provide support to the schools.

Interviews indicated that the District Leadership Team (DLT) has been created to ensure that all departments at Central Office have the opportunity to meet with principals three times a year. Some interviews and plus/deltas indicated that the information shared at DLT meetings could be incorporated into other meetings.

The District Strategic Planning Team (DSPT), previously known as the District Instructional Leadership Team, has been established but there is not a clear understanding of the purpose of this team. Some team members could not communicate the role and responsibilities of this team.

Based on interviews, the district liaison monitoring form has been created to review district initiatives and district systems, identify needs, provide support, and set goals. Principals complete the evidences and notes

prior to monthly meetings with district liaison. Interviews indicated a lack of consensus regarding the effectiveness and necessity of the meetings in supporting the school leaders.

A schedule has been established in the living calendar for Principal Cadre meetings. During these meetings the principals provide information regarding the work in their buildings (e.g., PLC data, iReady data, PDSA). District staff can provide updates and professional learning. Based on interviews and documentation the Principal Cadre is currently undergoing changes in order to make it more instructionally focused and geared towards providing support to principals. Some interviews indicated that additional restructuring is needed to achieve this goal and be an effective use of time.

SBDM councils have created bylaws, policies and procedures. These items are visible on each school's website. However, there is some evidence of accurate record keeping of policy review and revisions at all schools. Some SBDM councils have meeting agendas and minutes posted to the individual school websites.

The district submits and updates 30-60-90 plans to KDE before each state board meeting. There is some evidence of the integration of these plans into district processes.

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

There are nine employees on the district leadership team and each has numerous roles. The advisory board has adopted policies around the hiring process. The district organizational chart has been updated for the 2018-2019 school year.

#### **What are the communication structures in the school district?**

The advisory board has approved a district communication plan. Each school also has a communication plan. The district utilizes Facebook and the district webpage to communicate with parents and community members. The COLA is used to provide due dates and updates to all staff. Some interviews indicated that communication coming from the central office is improved, particularly with the use of email and other technology; however, interviews also indicated that the excessive quantity of communication is an issue. Advisory board members did not consistently articulate how information is communicated to schools, but some advisory board members were able to explain the varied mechanisms (e.g. flyers, automatic calling system, etc.) the district uses to communicate important happenings to the community. Interviews did reveal, though, that concerns persist that community understanding of district initiatives and activities may be limited or, in some cases, non-existent.

#### **What is the relationship between the central office and the Board of Education?**

Interviews indicated that the relationship between the advisory board and central office is positive. Advisory board members reported that they receive board meeting materials in a timely manner and that central office staff are available to answer any questions (e.g., accountability, testing, new construction project) they may have. 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.

#### **DEPLOYMENT:**

### **How far into the organization is the understanding of how the district is governed?**

The advisory board members generally understand their role in the governance of the district and how that is distinguished from the role of the State Manager. Interviews indicated that the advisory board members rely heavily on the continued guidance and coaching of the State Manager in maintaining appropriate board actions. Central office staff recognize the State Manager as the leader of the district and the important role he plays in directing their work. Interviews indicated that SBDM Council Members have an understanding of their role and the role of the advisory board.

### **How do you know?**

Many of the advisory board members indicated the need for continued guidance and coaching from the State Manager. 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. Some advisory board members expressed a limited understanding of policy development. Advisory board members were able to articulate what their role in personnel would be if they were not operating under state management. Some SBDM Council Members were able to discuss their role in developing school level policies, data analysis, hiring, and elections.

### **LEARNING:**

### **How are changes in policy and administrative tasks communicated in the organization?**

Interviews indicated that the advisory board members have a limited knowledge of how or if policy changes are communicated to principals, teachers, parents, and the community. Interviews indicated that principals hear about changes by attending board meetings and through communications (e.g., email, COLA, principal cadre) from designated district staff and the State Manager.

SBDM minutes for each school are posted online and indicate policy revisions. Some SBDM members indicated that principals share policy changes in newsletters and through staff emails.

### **How do they know that the policies and procedures are working?**

There is not a clear process or procedure in place to monitor the effectiveness of district initiatives, policies, or procedures. Interviews and observations indicated there is not a process in place to ensure that resources are being used for programs that are providing a return on the investment (e.g., Chrome Books, academic programs).

## **What are the processes in place to change the policies and procedures?**

Advisory board members indicated that they rely on KSBA policy updates and that any policy change has to receive two readings by the advisory board before adoption. Interviews indicated that there is a designated district level administrator that is tasked with bringing new policies or policy changes to the advisory board for adoption. However, interviews indicated there is not a systematic process in place to review and change policies and procedures to meet the individualized needs of the district and its schools (e.g., attendance policy).

### **INTEGRATION:**

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

There is limited evidence that policies and procedures have been aligned to meet the individual needs of the schools and the district. Interviews with advisory board members and central office staff indicate that there is an ongoing effort to align resource allocations with the district improvement plan.

### **Planning Recommendation:**

- Evaluate and align central office work and job responsibilities of personnel to ensure the necessary supports are provided to the schools. When reviewing job responsibilities of personnel an intentional focus must be placed on work load and employee capacity and skill set. Implement a systematic monitoring process to review the alignment of central office work and personnel job responsibilities. Alignment must include clear accountability for execution (e.g., central office staff).
- Review and determine the effectiveness and of the structure of district level and school level support meetings (e.g., COLA, DLT, DSPT, Liaison, and Principal Cadre). Create a structure that streamlines the efficiency and effectiveness of support meetings to ensure the goals of the schools and district are being supported. The necessity of support meetings should be clear.
- In order to meet the individualized needs of the schools in the district, central office staff and the advisory board need to move from a compliance mindset to one of continuous improvement. Decisions made should be based on research, school level data, and community needs and should be flexible to the changing needs of the district.

## **II. OPERATIONAL SUPPORT- Food Services**

- a. Team Members:** Steve Abbott, Katie Embree-Cleveland
- b. Persons Interviewed:** State Manager, Food Service Director, Head Cooks, Principals, Interim Principal, Educational Recovery Leader

## **APPROACH**

### **Who is the leader of the operational systems in the district?**

Jeffery Melkulcok is the Food Service Director for Menifee County.

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

Through various interviews, observations and documentation review, it is apparent that few written processes are currently in place to ensure program requirements are met appropriately. Standard processes within the National School Lunch Program (NSLP) such as meal counting and claiming, production records, and menu planning are not clearly written and accessible to staff. The director has not implemented processes to evaluate and monitor that staff understands program requirements and that they are accurately implemented in the schools. An onsite self-monitoring review was conducted by Director Melkulcok in SY 2017. The review did not note any deficiencies and did not indicate any corrective actions were required. Review of program records and observation of program implementation indicates that an accurate and full review of the required areas to be monitored were not accurately observed or documented. Subsequently, no corrective actions were implemented from this self-monitoring review.

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

After documentation review, there are few examples of policies for program requirements currently in place. Required program documentation is deficient in several areas which indicates either a lack of a clear policy and/or lack of monitoring and training for staff.

First, production records are a required program documentation that supports food production for the number of reimbursable meals claimed. Based on documentation review of the production records, all three schools sites yield noncompliance. At Botts Elementary, the manager indicated that she had not received instruction on how to complete the production record. Documentation review and onsite observation of the completion of the production record by staff showed that planned numbers are missing, forecasting is not occurring resulting in overproduction, food usage is not recorded, meal pattern crediting is missing or inaccurate as well as serving sizes were missing or incorrect. At Menifee Elementary, the production record meal pattern crediting was not supported by documentation. At Menifee County High School, production records for the salad bar were incomplete to the point that it was not possible to determine if reimbursable meals were produced. Interviews with site managers revealed that training on production records does not occur on a regular basis and there is not a system in place for monitoring correctness of production records by the director.

Secondly, the district menu planning process is not clearly defined by the Food Service Director and communicated to staff at each school site. It also lacks proper oversight which is causing program noncompliance. According to Director Melkulcok, he plans a district menu for all three sites and communicates that to site staff. At that point, site staff are responsible for implementing the menu which includes ordering and preparing the menu items. However, there is no process in place that instructs the site staff how to make appropriate menu substitutions within the meal pattern and how to communicate menu changes to the school administrators, students, and parents. Documentation for standardized recipes is deficient as well. Standardized



recipes are not provided to the sites so that food can be produced in a consistent manner and staff understand how each food item contributes to the meal pattern. School menus are posted on the website for Menifee Elementary and Botts Elementary, but not Menifee County High School. At Botts Elementary, the head cook understood the district menu to be merely suggestions for her. Each day when the menu gives a choice of items for students, she makes the selection for them. For example, on the day of observation the district menu on the website said students would have the choice of corn dogs or hot dogs. However, the head cook decided she would serve corn dogs only. This decision-making process occurs every day leaving the students without choice. The lack of a strong clearly implemented process for the district menu at each site leaves stakeholders without choices or knowledge of the menu for the day. Additionally, it creates frustration for staff in trying to piece together meals to serve increasing the risk for noncompliance in meeting the NSLP meal pattern requirements.

The district is required to have a Free and Reduced Price Policy Statement, a fundamental requirement of NSLP participation. After review of the Policy Statement, the district is not implementing the policy as required. Meal counting and claiming procedures are inadequate. At Menifee Elementary School, it was identified through documentation review that during a field trip, 40 meals were claimed by attendance count and not by actual meals served. A form is in place for staff to use for field trips but there is not a written procedure for food service to follow to ensure that proper counting and claiming of those meals occurs. At Botts Elementary, through documentation review on 8/9 and 8/10, edit checks indicated that more meals were served than students eligible. On 8/9, 247 meals were claimed, and attendance data indicates that only 199 students attended school that day. On 8/10, 227 meals were claimed, and attendance data indicates that 195 students attended school that day. Because an edit check procedure was not in place, staff did not discover the error and because the director did not monitor the edit check procedure, it again was not discovered.

Another example of a failure to implement the Policy Statement is the utilization of the point of sale system. The point of sale system software in the district is up to date, however the computer hardware used to run the software is out of date. The computers are slow, and several used in meal counting and claiming at areas outside of the cafeteria do not work. The Point of Sale (POS) system was configured incorrectly at Botts Elementary causing all students to be identified as a free status which in a participating Community Eligibility Provision (CEP) school should not occur. Due to the grade feeding configuration at Menifee Elementary School and Menifee High School, the sixth grade students eat breakfast in the elementary school gym with food prepared from the high school, but they eat lunch in the elementary school cafeteria with food prepared from the elementary school. These students are not easily found in the POS system. Staff at the elementary use a paper roster to count student meals during the lunch meal service. During the second chance breakfast meal service at Menifee High School, a paper roster is used which increases the amount of time it takes students to pass through the line to receive their meal. During the meal time observations, students did not pass through the line within the allotted amount of passing time or time between classes. Many students were still waiting for a meal after the bell to signal the next class period.

Another process that is crucial to food service is the food safety plan. Although the district had a written policy and each site had a food safety plan that was last updated in August 2017, the plan was deficient because it did not contain all the federally required components which includes an actual plan for monitoring the

implementation of the plan. After a review of each site for implementation of the food safety plan, it was observed that the plan's standard operating procedures (SOP) were not implemented. There was little evidence of training on those procedures and a monitoring system was not in place. One example of an inconsistent procedure was the handling of temperature logs for freezers, coolers and food items. Each site conducted the practice differently and at Botts Elementary there was no evidence of a second party monitoring of the temperature logs as required by the district's SOP. Packaged items that students return to the "Share table" (items such as milk) were not consistently stored in a manner that controlled temperature for the items.

Finally, another requirement of the NSLP is for the program to have a financial management policy in place. This policy is absent and therefore little financial management is occurring to ensure that the food service account continues to be sustainable. There is no evidence of a process for identifying plate cost of meals, forecasting food expenses, and very little non-program revenue sales occur. Inventory of food and supply items is taken, but there is not a monitoring system in place to ensure that it occurs correctly. There is evidence of overproduction on a consistent basis. Interviews with head cooks (who are serving as cafeteria managers) revealed that often times leftover food portions are served to students at no cost, or are just thrown away. Cost control measures are not in place therefore negatively impacting the overall food service budget.

## **DEPLOYMENT**

### **How are operational processes deployed and how do you know they are working.**

Operational processes are deployed through email and verbal staff communications by the food service director to site staff. There is not a centralized location for process documents or procedures for the director and/or staff to access or reference. Furthermore, the staffing structure at the three sites (Botts Elementary, Menifee Elementary and Menifee County High School) only provides each site with a "head cook" in lieu of a "cook/manager" or "food service manager". At this time, deployment of any operational processes to the sites is negatively impacted since there is no one on staff at each site whose job description can hold that person accountable to implement the process. At each site there is not a staff person with the given job responsibility of program management and the requisite documentation and reporting.

There is a lack of oversight for monitoring processes to ensure that the processes are working. For example, a practice that is implemented at all three schools is "Offer versus Serve" (OVS). The NSLP program application for all three sites indicates that each site conducts OVS for meal service. OVS gives students the opportunity to decline components of the meal and the meal is still eligible for reimbursement when the minimum is met, rather than a maximum of food items/components. At Botts Elementary, through observation and documentation review, staff did not conduct OVS and instead told students to take one of each food item. This led to food waste and therefore additional costs to the program. At the Second Chance Breakfast at the Menifee County High School, OVS was not understood by staff. During meal service observation of the Second Chance Breakfast, 26 meals served were identified as non-reimbursable at the point of sale. This is evidence that the Food Service Director should be monitoring production records and conducting meal service site observation, which would reveal that the process was not being implemented as required and the need for additional staff training.

## **LEARNING**

### **How do operational systems use data and information to improve?**

The district has electronic systems to allow for oversight of meal counts and participation. Also, program participation is high as the district implements the Community Eligibility Provision (CEP) which provides meals to students at no cost. Program participation trends are not tracked on a consistent basis. Based on interviews with staff at the sites, alternative meal service times or locations such as “Grab and Go” or “Breakfast in the Classroom” would be welcomed to increase participation. Interviews indicated past efforts to use student preference data (from taste testing) to determine menu items, but the data was not saved to use as reference for future product purchases. Use of the school website page to communicate program facts to families is inconsistent and not current. Menus posted on-line do not consistently match what is actually offered to students on a given day.

## **INTEGRATION**

### **What evidence is there that learning is shared throughout the organization?**

The Food Service Director has attended trainings at SCN (KDE Division of School and Community Nutrition) for the NSLP program. Since 2015 the director has attended eight trainings that were provided for NSLP sponsors. The director has provided the state required Kentucky One training for all new employees. The director has achieved the School Nutrition Association’s Level 3 Certification.

There is evidence that all staff met the professional standards established by USDA CFR 7CFR 210.30 for the required number of training hours in 2017-2018 on the Food Service Professional Standards Training Log. The director indicated that he did have a staff meeting in August of 2018, but sign in sheets or an agenda could not be produced. Even though training logs exist, it is evident through documentation review, staff interviews and program observation that additional training is necessary. Staff indicated that information is often shared verbally during their lunch breaks or just by drop in visits. The director indicated that he follows-up verbal information with email, yet two out of the three head cooks indicated they do not consistently use email to communicate with the director.

### **Operational Support Recommendation:**

- There is a systemic lack of communication and program oversight throughout the food service operation which is resulting in noncompliance with the federal regulations of the National School Lunch Program. In this situation, the director often referenced time as a constraint as to why issues of noncompliance were not addressed or discovered. It is strongly recommended that the job description and corresponding duties of the food service director be reviewed and that the position be the sole responsibility of a single staff member without the duties of other jobs. The NSLP is a federal program that must meet federal compliance requirements as well as additional state compliance in several areas. The food service budget is sustainable and would support a full-time director’s salary which would allow for better oversight of the Child Nutrition Program.

- It is recommended that each site have a clearly defined manager role in place to ensure that implementation of the program processes and procedures, as communicated by the director, are being implemented correctly in accordance with federal and state guidance.
- It is strongly recommended that a menu planner develop a consistent unified menu for the district. The district menu should be communicated clearly to all stakeholders. Deviations from the menu should be communicated by the director to all who need to know, and any deviations made by site managers should be clearly communicated and explained to the director. The menu should provide students with choice and include student preference in menu planning. The district menu should include clear standardized recipes that all sites follow and understand how those recipes credit towards the meal pattern. Oversight and monitoring must be in place to ensure that the recipes are being followed accordingly and that production records and food usage are documented correctly. The district menu should be monitored for inventory fluctuations and allow for proper forecasting to ensure adequate ordering and cost savings.
- Development of and communication about training and monitoring of program policies and procedures is vital to ensuring program compliance. It is strongly recommended that the district create a “Policy Development and Communication Plan”. It is strongly recommended that all staff receive adequate training on a consistent basis on implementation of the procedures. The district must implement a continuous monitoring plan to ensure proper understanding is in place. If a lack of understanding is found through monitoring, then retraining must occur. Even if understanding is occurring, monitoring is still crucial to ensuring consistent application of the programs and goal setting for improvements.
- It is strongly recommended that a comprehensive staff training plan on program requirements and district implementation of those requirements be developed, implemented, and monitored. Staff should have a clear understanding of program processes and procedures. It is essential to invest in staff program knowledge to aid in meeting compliance and ensuring that the program operates at its highest standards.

## II. OPERATIONAL SUPPORT- Facilities

- Team Members:** Marcus Highland, Kay Kennedy
- Persons Interviewed:** State Manager, Facilities Director, Principals, Interim Principal, Custodians, Educational Recovery Leader

### APPROACH

#### **Who is the leader of the operational systems in the district?**

Jeff Melkulcok performs the role of both Facilities Director and Food Service Director. He indicated that approximately 60% of his time is allocated to Food Service Director responsibilities and the other 40% is allocated to Facilities Director responsibilities (although there is no mention of “Facilities” on the website under the “Departments” heading). Assisting Mr. Mulkulcok is one full-time district-wide general maintenance employee. A second district-wide general maintenance employee splits his time between maintenance and landscaping/mowing. No employees are certified in any specific trade such as an electrician, plumber, or Heating Ventilation and Air Conditioning (HVAC) technician.

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

The 4-year District Facility Plan was last submitted and approved by the Kentucky Board of Education in June 2017 indicating a District Need of \$26,560,434 for new construction or renovation of existing facilities. The plan calls for construction of a new K-8 School to replace Menifee Elementary and Botts Elementary Schools, the demolition of the aging Menifee Elementary facility, and repurposing Botts Elementary to become the Central Office and an Alternative School.

Since the 2014 Audit, the district has complied with the procedural and submittal requirements of 702 KAR 4:160 Capital Construction Process for three (3) emergency repair projects and for the new school project currently underway.

The District has employed a third-party HVAC contractor for a district-wide preventative service contract on all mechanical systems in the district because of the lack of technical training of the district staff. This contracted service is both cost effective and provides a needed service that no employee in district is qualified to provide.

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

A new District Emergency Management Plan coupled with new KSP training for Lockdown procedures were recently implemented. District safety and security policy/procedures are posted at each school and on district webpage. In a lockdown situation, classroom doors remain locked until the principal declares the facility is clear and unlocks the individual doors.

Custodians and Principals submit Service Requests to Mr. Melkulcok to order maintenance supplies or to report maintenance service needs. When Service Needs exceed the training level or experience of the district maintenance staff Mr. Melkulcok submits a District Requisition Request (paper document) to Central Office. Any District Request over \$1,000 or any emergency need requires approval by Mr. Spencer. Service Requests are tracked on a spreadsheet and reported monthly to the Board. Maintenance supplies can also be requested via text messages to Mr. Melkulcok. Custodians from the High School and Menifee Elementary pick-up/check-out supplies directly from the central location. A maintenance worker delivers supplies directly to Botts.

The district experienced flooding at Menifee Elementary, Menifee High School and the Central Office the evening of September 9, 2018 due to regional flash flooding. The district has experienced flooding in the past and ServPro was immediately contracted and on-site the next morning to mitigate water damage and to quickly restore operation of the facilities. As a result of the quick actions of staff and the responsiveness of the vendor, the district school was cancelled for only one day.

## **DEPLOYMENT**

### **How are operational processes deployed and how do you know they are working.**

Interviews indicated that custodians and principals are satisfied with maintenance and operations as compared to the condition before state management. While operational processes are more centralized and improvements

have occurred, the potential for a professional facility operations system is not yet understood. With a small staff, relations are more personal than professional, and activities of the department are event based rather than strategic.

## **LEARNING**

### **How do operational systems use data and information to improve?**

Since the 2016 management audit, the District has implemented a new central district warehouse approach to inventory distribution. Service requests and inventory are logged and tracked on a spreadsheet for each facility and reported monthly to the Board. Inventory expense tracking is coded and recorded in MUNIS by the finance officer. It does not appear the district utilizes the tracking data for cost or efficiency evaluation or to forecast future opportunities for improvement.

Under State Management, budgets of \$10,000 per year for equipment repair and maintenance and supplies for each facility have been established. 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.

## **INTEGRATION**

### **What evidence is there that learning is shared throughout the organization?**

Schools were generally found to be clean, secure and well maintained though aged. No major systems or operations were reported to be out-of-service or inoperable.

The district safety policy appears to be implemented and followed at all levels of administration.

### **Operational Support Recommendation:**

- It is recommended the district review the responsibilities of the Facilities Director and the allocation of time for those duties.
- It is recommended the district move with haste to establish the schedule and funding for the new school construction and the configuration of the grade structure in each building.
- It is recommended that this district utilize a building maintenance software program to track costs, purchase orders, and work orders.

## II. OPERATIONAL SUPPORT- Transportation

- a. **Team Members:** Roger Kerns, Kay Kennedy
- b. **Persons Interviewed:** State Manager, Transportation Director, Vehicle Maintenance Inspector, Principals, Interim Principal

### APPROACH

#### **Who is the leader of the operational systems in the district?**

The Transportation Director Tim Hacker is the leader of the transportation department. However, he also serves as the district's Director of Pupil Personnel (DPP). Mr. Hacker indicated that he spends 70% of his time on duties related to Transportation Director and 30% of his time on duties related to DPP.

The principal is the leader for the discipline for the students who ride the bus and attend that principal's school. During the audit, the principal at Botts Elementary was available for an interview, the Menifee Elementary principal was not available for an interview, and the high school principal, serving in an interim capacity, was admittedly not fully aware of the process for discipline in Menifee County.

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

The Transportation Director prepares and conducts the annual 8-hour update. Drivers stated that they would like to have more "behind the wheel" training in their updates. The drivers are paid for and should have 6 (4-hour days) of training days but content for only three days was documented.

Since the last district management review, all driver's training records have been brought up to date and are current.

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

The 2018-19 Pupil Transportation Manual, providing information to the district's employees, is posted on the district website. The manual appears to have been reviewed with no changes being made in the last year.

Student discipline on the bus is addressed in the "Uniform Code of Student Conduct Handbook 2018-19" posted on the district's website. Infinite campus is used for tracking bus discipline referrals. There was no evidence of any issues concerning student discipline on buses.

### DEPLOYMENT

#### **How are operational processes deployed and how do you know they are working.**

Menifee County acquired a building in November 2017, on the northern area of the county near the Montgomery County line and is utilizing it as the bus garage. Menifee County is not using the building to the full extent of its potential. There were several thousands of dollars of bus supplies/parts that were still stored in the out building behind that board office and were ruined by the recent floods. There was no explanation provided as to why all supplies/parts were not relocated to the new site.

The technician now has a service truck to be able to do service runs for buses that might have on the road breakdowns.

Menifee County uses parts on the state bid list. Menifee County is limited on resources available for miscellaneous parts.

The head technician has reported infractions to the transportation director. There are repeated inspection infractions and the transportation director does not hold drivers accountable. Dirty buses, items left on buses, and incomplete inspection reports are examples of repeated infractions that the head technician has reported to the State Manager to be consistently addressed.

Supervision at the high school/K-8 school during the loading/unloading of the buses (both morning and afternoon) is adequately staffed. However, the supervision being provided is not focused on the students as they enter or depart the bus areas and subsequently board the buses. This is evidence that the Transportation Director is not providing oversight of the loading/unloading process which directly impacts student safety.

Page seven (7) of the Pupil Transportation Manual 2017-18 (Policy 06.31 AP.1) indicates that, as notification to parents, the bus routes will be posted to the district website. Although somewhat difficult to locate, the bus routes are posted to the website.

## **LEARNING**

### **How do operational systems use data and information to improve?**

A state level transportation consultant has made monthly visits to the district since July 2016. The technician has been retrained and recertified to maintain the bus fleet.

Since the 2016 management audit, the condition of the buses has improved dramatically. It appears that the drivers are doing a better job of reporting operational deficiencies found on their buses and turning in the proper paperwork to the technician to have the deficiencies repaired instead of ignoring them.

The Transportation Director stated that routes are reviewed annually for efficiency. However, there is no evidence that data such as (a) total mileage or (b) the mileage that buses travel with no students aboard are factors considered in the annual efficiency analysis. In 2016, 24% of the miles traveled by the buses to and from school were empty miles. There was no current data available to compare for 2017 & 2018 school years. It is considered best practice to analyze if buses are running unnecessary miles empty of students and if that could be reduced.



## **INTEGRATION**

### **What evidence is there that learning is shared throughout the organization?**

It appears that drivers attempt to have a good rapport with the students who ride their buses. One principal stated that in their opinion some drivers go above and beyond working with students who cause discipline issues often avoiding having to do a bus referral. Drivers feel that they have support from the principal and transportation director concerning student discipline.

Menifee County has been purchasing buses and currently have no buses out of the 14-year depreciation cycle.

### Operational Support Recommendation:

- It is recommended that the district review the job responsibilities for the Transportation Director and the allocation of time for those duties.
- It is recommended that the district develop specific objectives for annual training that reflect employee needs.
- It is recommended that district include actual miles traveled (with or without students) when analyzing cost efficiencies.
- It is recommended that the district inventory all tools, parts, and supplies in the Transportation Department and manage them from the central garage facility.
- It is recommended that the Transportation Director periodically observe loading/unloading procedures at each school and implement changes as necessary to improve student safety.

## **III. FINANCIAL MANAGEMENT- Central Office**

- a. Team Members:** Steve Lyles, Kay Kennedy
- b. Persons Interviewed:** State Manager, Finance Officer, Community Outreach Director, Head Technology Technician

## **APPROACH**

### **Who is the leader of the financial management system in the district?**

Lorri Bartley is the finance officer of the district. She has been employed there for 3+ years. Lorri Bartley has done a great job of improving the financial picture, not only at central office, but of the district as a whole. According to the state manager, she holds district employees accountable for monies spent.

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

### Budgets

Each month the finance officer presents to the school board the financial picture of the district. A comparison of budget to actual of all funds, for both revenues and expenditures, is part of that presentation. A sample of board minutes and the accompanying financial documentation was reviewed to confirm the financial reporting.

### Policies/Procedures

Menifee County subscribes to the Kentucky School Boards Association (KSBA) Online Policy & Procedure Manuals. It contains the policies and procedures the board has adopted for implementation in the district. Several of the select policies and procedures are encapsulated in the digital documentation provided and based on interviews, it was found that a few policies were lacking. Examples of the unwritten/unknown policies or procedures were: 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; the district has a few staff who carry district paid cell phones, yet finance was unaware of a written cellphone policy; and, there is no formal process for employees or the general public to file complaints of financial fraud, waste, or mismanagement (a hotline).

### Planning

The finance officer utilized the worksheets and information provided on the KDE website to construct the annual budget based upon the statutorily required staffing allocations. She shared that information to the local board and it was approved, per the board meeting minutes provided by the district.

The tracking of student attendance is a major factor in SEEK (Support Education Excellence in Kentucky) funding for the district. The Director of Pupil Personnel DPP is responsible for accurately tracking and reporting student attendance to the state. The DPP indicated that only 30% of his time is allocated to the duties of DPP. There is no evidence the district reported to KDE, as required by KRS 159.140(2), the part-time status of the DPP. At the time of the audit, the schools had not finalized the Month 1 reports and Month 2 was set to end within the week. Delayed balancing of monthly attendance can exacerbate reporting errors and create additional problems for future reports. Also, the limited allocation of time for DPP duties limits the ability to implement district strategies to improve student attendance which does have a financial impact.

### **What is the relationship between the Central Office finance staff, the Board of Education, other Central Office staff, and the schools?**

The finance officer utilized the worksheets and information provided on the KDE website to construct the annual budget based upon the statutorily required staffing allocations. She shared that information to her local board and it was approved, per the minutes of board meetings provided by the district.

### **DEPLOYMENT**

**How are the finance internal controls deployed throughout the district?**

### Internal Controls

Menifee County keeps the district policies and procedures up to date on an ongoing basis. The Director of Special Education is tasked with this duty. She posts any changes the board makes to such policies and procedures to the KSBA Online portal, to which the district subscribes.

### Grants

During the review, the 2016/2017 Menifee County School District financial audit and, in particular, the Schedule of Federal Awards (SEFA) were examined. From the SEFA, two of the grants (Title I, and Title IIA) were randomly selected for analysis. Grant awards, employee timesheets/activity reports, and random disbursements from each grant were chosen and reviewed. All paperwork reviewed was as expected and in proper order. The paperwork is housed in digital form in Munis, the statewide school district accounting system (see purchasing/payables below).

### Purchasing/Payables

Menifee County uses workflow within Munis to electronically approve purchase orders. The state manager and finance officer sign off on purchases greater than \$1,000. The district, in the past year, implemented scanning of payment documentation within Munis so paperwork will be easier to locate and also to reduce storage space required to house cancelled checks, invoices, PO's, and any other purchasing paperwork. A sample of checks, invoices, and purchase orders were reviewed for proper signatures, dates, and coding and found to be in order.

### Payroll

Each principal is equipped with a manual that contains policies and procedures for the district. The very first item in the manual are the Payroll procedures (including timesheet samples and leave forms). Administrators throughout the district are also equipped with the same information about payroll.

The district utilizes the E-Stub program by PSST (a third-party software vendor) to provide transparency and ease of access to employees for individual payroll data such as check stubs, check history, and W-2's.

### Investments/Cash Management

Monthly bank statements are reconciled to the Munis financial system. A sample of a couple of months of the bank statements and Munis reports were reviewed and found to be in good order.

Menifee County Schools also has an investment policy in the KSBA Policy Manual under Investments 04.6. Based on discussion with the finance officer, the district does not currently have excess funds to invest.

### School Activity Funds/Other

The finance officer mentioned that an outside Redbook expert is brought in to teach/update central office and school level staff each year. Principals, the bookkeeper, the athletic director, coaches, and PTO members are invited to attend but there were no attendance logs or sign-in sheets provided to confirm attendance.

**How do you know?**

A sample of financial documents was reviewed. In addition, a sample of files and reports within Munis were reviewed and indicate that the internal control processes for financial controls are in place and working.

There is no formal process for an employee or other stakeholder to report any suspect activity related to financial operations. The district should consider a means for employees to report fraud or other abuse of district resources.

**LEARNING**

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

The annual School Report Card published by KDE and the Annual Financial Audit which contains a descriptive MD&A (Management’s Discussion and Analysis) are good measures of how the district is doing from year to year in comparison to surrounding districts and to like “sized” districts. In addition, the district has access to financial indicators from other districts for comparison.

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

Each year, an annual independent audit is performed for the school district. The 2016/2017 report was classified as an unmodified opinion which means the auditor reported there were no findings associated with the financial statements or federal awards presented by the district. Only minor irregularities, known as management letter comments, were reported by the auditor relative to “Redbook” issues at the school level.

**How is the Board informed of the financial status of the district and the impact of the budget on student performance?**

The school board is provided each month with a packet of information that includes a financial summary of the district. The financial summary includes the bank reconciliation, cash flow projections, balance sheet (by fund), budget report for the general fund, and financial statement by fund. The finance officer reviews the reports and answers questions the board may have. Although the financial statements are posted to the Menifee County Schools website, they are linked to the Finance Officer and not specifically to the board meeting they are considered. The financial statements are not linked to the board agenda document not to the board meeting minutes for transparency and ease of reference.

## **INTEGRATION**

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

The trajectory of the district financially is in a positive direction. As evidenced by the School Report Card data in Open House on the KDE website, the districts fund balance has risen significantly over the past three years and the stability and knowledge of personnel in the finance office has positively influenced that growth.

#### Financial Recommendations:

- It is recommended the district develop written policies and procedures for the usage of district vehicles.
- District staff were not familiar with a cellphone policy. However, a review of the policies provided by the KSBA service, 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. It is recommended the district amend the existing policy to provide a procedure for deduction of personal cellphone usage and communicate the policy to district staff.
- District policies and procedures should be developed and implemented that provides a system for investigating, monitoring, and reporting complaints (either at the school level or the district level). An anonymous complaint system is a necessary part of a healthy district.
- It is recommended that the district review the job responsibilities for the Director of Pupil Personnel and the allocation of time for those duties.

### **III. FINANCIAL MANAGEMENT- School**

- a. Team members:** Nicole Vanover, Jackie Chism
- b. Persons Interviewed:** Principal Botts Elementary, Bookkeepers

## **APPROACH**

### **Who is the leader of the financial management system in the schools?**

The financial management system in the schools, is ultimately overseen by the state manager, Tim Spencer, and the board members. It is predominantly managed by the principal and finance staff. Each school maintains a Site Based Decision Making Committee (SBDM), which consists of five council members made up of teachers and parents, along with an administrator. The SBDM is governed by state law (KRS 160.345), and generally meets monthly to discuss and approve financial matters, policies, and other school business. Some copies of the SBDM minutes are posted on each school's webpage on the district's website; although, many are not signed and/or dated to conclusively prove who was in attendance.

**What internal controls are in place to ensure the fidelity, efficiency, and accuracy of the financial records of the schools?**

The SBDMs meet monthly and appear to be comprehensively involved in the school budget and staffing allocation decisions per state law (KRS 160.345). There are no financial reports attached to the minutes as documented evidence that the principal and board members review these during the meetings. If the information is being presented, it is recommended those reports be formally attached to the monthly minutes. It was also noted that the high school did not have the SBDM meeting in September. As of the date of the audit, the missed meeting had not been rescheduled. For the SBDM to be comprehensively involved in the decision making in the school budget and staffing decisions, monthly meetings are imperative. It is also noted that the interim principal at the high school, Michael Tate, who at the time of this management audit had only been serving for fifteen days, has a limited knowledge of the high school's finances.

Accounting Procedures for Kentucky School Activity Funds ("Redbook") are mandated and referenced in 702 KAR 3:130, Section 2 and KRS 156.070. 702 KAR 3:130 outlines the school activity funds for districts and each school ensures the principal, bookkeeper, and coaches attend annual Redbook training. Based upon interviews with the principal and bookkeeper, the district is adhering to these trainings; however, no training logs were maintained as evidence.

**What is the relationship between the Central Office finance staff, the Board of Education, other Central Office staff, and the schools?**

Based upon the interview with the Botts Elementary principal, Jeremy McNabb, communication is working well with the Central Office. The board members often ask him if he needs assistance, and the Central Office Finance Officer (FO), Lorri Bartley, clarifies administrative duties and finance processes with him. Because Interim Principal Michael Tate has just started with the high school, communication has been minimal. The KDE team was unable to meet with the Menifee County Elementary principal, Tonya Means, as she was out of town. The bookkeeper, Beth Brown, who serves all three schools, works well with the Central Office and obtains answers for any questions she has, or problems she encounters. She relies heavily upon the FO at the Central Office for support. From a financial assessment, there appears to be no hindrances.

**DEPLOYMENT**

**How are the finance internal controls deployed throughout the schools?**

Formal annual Redbook training is given to the principals, bookkeeper and coaches. Teachers receive no formal Redbook trainings as evidenced by interview responses. Interview responses also indicate the understanding that the 'Redbook personnel' (from the state level) send updates to the Central Office finance officer, who then forwards emails to staff members to whom the rules apply.

All three Menifee schools employ one bookkeeper, who serves all schools. She physically works at the high school where she maintains all the purchase orders, multiple receipt forms, booster club activity budgets, copies

of bank statements, and supporting documentation. The bookkeeper photocopies all checks; records receipts on a deposit ticket; records revenues to deposit tickets; enters the invoices; prints the checks; matches the invoices to checks; and mails checks. The guidance counselor and secretary review the bookkeeper's initial reconciliation, with the finance officer or principal performing the final reconciliation.

The high school secretary opens the mail addressed directly to the school's finance department or the bookkeeper. If mail is addressed to a staff member at either the high school or elementary school, it is transmitted directly to them. The secretary at Botts Elementary performs the same procedures, with the exception of finance officer and bookkeeper mail which is picked up by the bookkeeper at the Botts school. All schools participate in on-line banking and do not receive physical copies of bank statements. The bookkeeper makes copies from the on-line statements for reconciliation purposes.

The principal and bookkeeper interviewed, confirmed that deposits are made daily, or when funds collected totaled at least \$100. The high school maintains a safe that is available to safeguard funds received, and no schools maintain a petty cash fund. Both Menifee High and Elementary schools retain two Walmart credit cards in the bookkeeper's locked filing cabinet during the day; however, Botts Elementary does not utilize a credit card. All schools confirmed they maintain one bank account for school activity funds. Menifee High School and Menifee Elementary School also maintain a charitable gaming account.

All schools confirmed that if a transfer took place between activity funds, they were completed properly with a transfer form. KDE did observe transfer forms with strikethroughs. The bookkeeper stated she was made aware of the errors during the FY18 independent audit and had made notes and corrections on the transfer forms. The auditor identified that the bookkeeper was placing account numbers on transfer forms rather than the actual amount of the transfer. On the date of the audit, she was also advised by the independent auditor to move account funds to the general fund for those clubs that had been discontinued (Book club and Fiscal Education Club). According to Redbook, when an account becomes inactive, the organization should designate how the unobligated funds are disposed, or they should be transferred to the general fund.

All schools acknowledged that the PTO's maintained their own FEIN and bank account. The schools PTO's are required to submit names of the club officers and submit an annual financial statement itemizing revenues, expenditures, and beginning and ending balances. All schools confirmed their PTO's were adhering to this requirement.

Invoices with accompanying purchase orders and supporting documentation for all school activity funds are retained at the high school. All were reconciled properly and contained the proper approvals, signatures, and initials, and filed by month and check numerical order. Multiple receipt forms are also retained at the high school and were completed with required signatures. In the sample reviewed, one was missing a date.

Despite the use of online banking, KDE observed bank statements at the high school and noted they were initialed but did not contain dates. Per Redbook, the bank statements should always be signed and dated by the principal prior to the "bookkeeper" receiving it.

The KDE team confirmed that ticket sales were overseen according to the internal control provisions with payments to district employees such as coaches and sponsors, being paid through MUNIS payroll, and not from the school activity funds. Payments to officials who are non-district employees, are paid by check from the

school activity fund with a standard invoice, signed by the payee. It was noted though, that the Redbook worksheet FSA5, which supports booster club requisitions, was not being completed.

Requisitions are completed in MUNIS by the bookkeeper, and the principal and Central Office finance officer review them after the bookkeeper's completion. When questioned about the district's procurement policy, the bookkeeper was unaware of what the model procurement policy entailed, but believes Central Office follows it.

When asked about the support/booster organizations' annual financial statements, the bookkeeper stated that everyone submitted theirs by July 25<sup>th</sup> with the exception of girls basketball. She also stated that the girls basketball had not submitted names of the officers which is required within 30 days of their first transaction. She was not certain they had encountered a transaction on the date of the audit. Reasons for the infractions consisted of the elected position undergoing personal matters which subsequently caused her to neglect her duties.

Grants; if applicable, are administered, processed and maintained at the Central Office.

### **How do you know?**

KDE's team reviewed the SBDM minutes for all schools and the management comments noted in the last external audit conducted at the school level for each school and inquired with the bookkeeper about all comments pertaining to schools. The Central Office finance officer has discussed the comments with the bookkeeper who has been very proactive to help ensure the comments are not repeated in the next fiscal year. The KDE team reviewed a sample of invoices with accompanying purchase orders and support documentation including receipts, bank statements, check copies, or stubs for each school from the bookkeeper. The team also reviewed the requisition and report of ticket sales, and confirmed first and last tickets were attached, and money reconciled. The KDE team reviewed a sample of transfer forms. Inquiries about grants and travel reimbursements were made by the KDE team, who was told by the bookkeeper they were maintained at the board level.

KRS 160.345 requires the adoption of school councils for school-based decision making (SBDM), and the district utilizes the councils in each school. Upon review, KDE's team noted that Menifee's website only contained some of the monthly SBDM minutes for each school. Furthermore, the minutes that were on the site, did not contain signatures of the council members. During the interview with the Bookkeeper, KDE's team requested copies of the minutes, which were provided. It was noted the copies also did not contain council members signatures, in addition to any written information attached.

## **LEARNING**

### **What data and information are used to improve the financial standing of the district?**

Based upon the two principal interviews the KDE team conducted, the SBDM Committee establishes the budget priorities and staffing allocations in addition to approving technology, bylaws, and policies. The Board meets monthly and reviews the working budget closely with the SBDM to ensure the budget is tailored to meet the needs of the students.



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

The annual audit report together with the auditor’s notes, assists in the assurance of the adequacy of the internal controls and procedures within the district. The review of the FY2016/2017 audit report, indicated 3 comments relative to the school level and none of these were repeated findings.

**How is the Board informed of the financial status of the district and the impact of the budget on student performance?**

Each year, an independent annual audit is performed at the school level pertaining to school activity funds. On the date of the Management Audit, the latest audit available for inspection was for the FY2016/2017 school year. If the school management letter comments within an audit are considered measurable, they are brought to the attention of the school board.

**INTEGRATION**

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

Adherence to the Redbook policies and procedures as mandated by 702 KAR 3:130 and KRS 156.070, is crucial for districts’ to correctly report finances through a method of uniform accounting to insure school activity funds are consumed correctly. There is a need to educate additional staff, such as the teachers, who are considered essential in assisting the finance staff with school activities.

The KDE team noted in their interviews, the communication between the schools and central office with respect to financial activities, was positive. Despite the bookkeeper wearing multiple hats, she is very well organized and has managed to implement safeguards that work for her small district. The most important thing to remember in segregation of duties is that one employee cannot be responsible for custody of assets, recording of transactions, and authorizing transactions. The bookkeeper is utilizing the guidance counselor and secretary to review reconciliations and all checks are being signed by two persons.

**Financial Recommendation:**

- It is recommended that all monthly SBDM minutes contain signatures of the council members, in addition to any supporting documentation presented during the meeting. All the current fiscal year, and previous fiscal year minutes along with any supporting documentation should be posted on the website. The SBDM should meet on a continual basis and any cancelled meetings should be promptly rescheduled.
- It is recommended that additional staff such as teachers, are included in the Redbook training, as they are actively involved with the initiation of required Redbook forms such as Multiple Receipts Forms, in addition to ticket sales, as they may also assume the role of ticket taker in the school’s extramural

activities. Providing training to additional personnel, will also assist the finance staff who may have to take unexpected leave, or retire from the district.

#### **IV. PERSONNEL ADMINISTRATION**

- a. Team Members:** Kay Kennedy
- b. Persons Interviewed:** State Manager, Finance Officer, Administrative Assistant to the State Manager

#### **APPROACH**

##### **Who is the leader in hiring and staffing for the district?**

State Manager Tim Spencer is the leader in hiring and staffing for the district. Lori Bartley is the leader for day-to-day activities related to hiring and staffing.

##### **What processes are in place to hire, train, and provide support for certified and classified staff?**

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.

##### **What processes are in place to ensure fairness in staffing?**

Certified and classified positions are posted on the district website. Certified positions are also posted on the Kentucky Educator Placement Service (KEPS) on the KDE website.

Principals have access to applications for the posted positions. SBDM councils are included in the interview process for staffing in their respective schools.

#### **DEPLOYMENT**

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

The district uses online application process from Talent Ed to facilitate the hiring process. There is a computer available in the reception area of the Central Office building for use by applicants who may not have other access to the online application process.

Each personnel file has a file inventory sheet affixed inside the front cover. Documents are added to the employee files as they are received in central office. There is no formal process in place to review the files on a regular basis for accuracy and completeness.

#### **LEARNING**

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

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. Evaluations are kept in employee’s personnel file maintained by Superintendent’s Administrative Assistant.

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 timely manner and update the website accordingly.

**INTEGRATION**

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

The application process is readily accessible on the district’s website. Personnel reports are included as a specific item on the regular board meeting agendas.

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

Based on the goals and objectives of the Comprehensive District Improvement Plan and the Comprehensive School Improvement Plans, staffing allocations are approved by the board of education and given to each school’s SBDM councils. Open positions are advertised, applicants are interviewed, and hiring recommendations are made according to the district’s policies.

**Personnel Management Recommendation:**

- It is recommended that the district develop and implement evaluation instruments that accurately reflect the job duties and performance expectations for all approved positions.
- It is recommended that the district develop a process to review and amend the Employee Handbook in a timely manner.
- It is recommended that the district develop and implement procedures to track professional development and pertinent training for all employees.

**V. INSTRUCTIONAL MANAGEMENT**

**a. Team Members:** Susan Greer, Tim Godbey, Todd Tucker, Crystal White, Curtis Higgins, Kim Cornett, Jeanne Crowe, Kevin Gay

**b. Interviewed:** Classroom Teachers (62), State Manager (1), Educational Recovery Director (1), Instructional Supervisor (1), District Assessment Coordinator (1), Director of Special Education (1), Director of

Technology (1), Instructional Coaches (3), Parents (6), School Counselor (3), Principals (2), Education Recovery Staff (8), GEAR-UP Coordinator (1), Instructional Assistants (3).

## **APPROACH**

### **Who is the leader of the curriculum and instructional processes in the district?**

The Instructional Supervisor is Robin Brewer, who serves as the leader of curriculum and instruction across the district. She is also the Coordinator of the Instructional Coaches, Principal Liaison, 21<sup>st</sup> Century Grant Coordinator, directs the Principal Cadre, Liaison to SBDM Councils and directs the New Teacher Cadre. Her roles include a range of other duties (e.g., district walkthroughs, attending professional learning community meetings, assisting with CDIP/CSIP processes). Interviews and documents indicated that Robin Brewer leads curriculum and instruction processes through a collaborative approach that included the district leadership team comprised of the superintendent, principal and other district leaders (Strategic Planning Team) and trickles to instructional coaches, principals and teachers.

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

Curriculum alignment documents exist in the district and have been a focus of teacher work during the past two years according to interviewed staff members and submitted documents.

Through interviews, teachers indicated the district has supported this work through release time, training and also has provided processes promoting teacher voice along with involvement in the curriculum development process. The district has formed curriculum teacher teams who meet and spend time creating curriculum maps and pacing guides; where standards are deconstructed into scaffolded learning targets. These teams consisted of representatives of both elementary schools to ensure a common curriculum is implemented in the two schools. They also focused on the development of common formative assessments in reading and math across grade levels (K-8). Teacher teams have embedded elements of writing into the curriculum from the recently developed school-wide writing plan. New teachers to the district (elementary/middle) indicated curriculum documents were readily available to them upon hire, along with resources to deploy the curriculum.

Teachers and administrators indicated there is a district expectation for schools to implement a Professional Learning Community (PLC) protocol through which student data can be analyzed and next steps can be written. The district has also provided resources (e.g., Journeys, GoMath, iReady, ALEKS, Reading Plus) to support the curriculum in order for students to master the standards. School administrators participate in PLCs to give feedback, ask questions and monitor ongoing work around curriculum, pacing, and data results. Notes from this

work are used at the end of the year to make curricular adjustments. However, the effectiveness of these adjustments and school-level feedback to teachers remains unclear.

### **How do you measure effectiveness of these processes?**

A Menifee County Principal Liaison Meeting occurs monthly, based on interviews and documentation. There is a standing agenda of items for this meeting (e.g., curriculum monitoring, determining areas of need for district support, discussion of instructional process, walkthrough data, surveying principal feedback to teachers). However, the next steps do not reflect the in-depth agenda items but are more surface level, one-time event, activities. Therefore, while this meeting is designed to monitor several initiatives, the measure of effectiveness for each item remains unclear as to how the system for each is informed or changed based on the fact that the meeting occurred.

Interviews and documentation indicated the development of a systematic district curriculum process (e.g., three year plan, pacing, maps, monitoring, agendas and common assessment expectations). Through this process the teachers established a common curriculum with maps, detailed pacing guides and common assessments; however, gaps remain in relation to congruency to Kentucky Academic Standards (KAS). Teachers meet in grade/content level teams monthly to discuss curriculum modifications and suggest revisions.

PLC processes, at the school level, were developed to monitor and adjust curriculum, assessment and instruction. Artifacts and meeting observations suggested that in PLCs, teachers share and analyze student data while discussing standards and instructional strategies. The district instructional supervisor periodically attends PLCs, while school administrators attend each week.

Interviews and artifacts provided evidence to demonstrate the district did initiate these processes for curriculum development, implementation and review. Multiple stakeholders expressed the importance of this work and how the majority of teachers have been involved. Further expressed was the recent nature of this work with its development and implementation occurring over the past eighteen months. Evidence also indicated the curriculum has been consistently reviewed through the above mentioned mechanisms; however, it is unclear how these processes are actually measured for effectiveness or how they are used to measure the impact on student achievement and academic performance.

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

Interviews and professional learning documentation have indicated that training on and implementation of Direct Explicit Instruction (DEI), as the district instructional process has occurred. School and district

leadership have set an expectation of daily implementation of DEI. There is evidence of a walkthrough instrument, the Instructional Process Observation Form (iPof), used by school administrators and instructional coaches to monitor and provide feedback on the five phases of DEI. District personnel conduct ELEOT walkthroughs for the same purposes; however, there is limited evidence to suggest there is a formal, systematic process (e.g., schedule, feedback protocol).

Additionally, the schools have implemented a PLC process that engages teachers in conversation around the level of rigor aligned to the standards. The process prompts teachers to post and share their standards with learning targets, activities, success criteria and student performance data from assessments, which is reviewed and analyzed by teacher teams. Interviews indicated that grade level and content area common formative assessments are in the process of being created in order to measure and compare student achievement horizontally. There is evidence, through documents and interviews, that high school and middle school teachers are expected to use a Plan-Do-Study-Act (PDSA) lesson framework. K-5 teachers use the Congruency, Accountability, Technique and Success Criteria (CATS) as their lesson framework. The purpose of these organizers are to intentionally communicate to students what they will be learning, how they will be learning it and how it will be assessed.

### **What evidences are there of alternative programming for students?**

Evidence of alternative programming included a Day Treatment program, Special Education services, 504 plan services and credit recovery opportunities. Interviews also indicated two FMD units (one at MES and one at MCHS) exist. These students are all mainstreamed periodically during the day in accordance with their Individualized Education Plans.

The Menifee County Board Policy, under section Alternative Education (09.4341) states, “The purpose of the Board’s Alternative Education Program is to provide:

- \* Learning activities that support innovative pathways and are aligned to college and career outcomes for all students.
- \* A curriculum that is aligned with the Kentucky Academic Standards and the learning goals in each student’s Individual Learning Plan (ILP).
- \* Successful student transition to the regular school assignment, when possible, or to post-secondary status.
- \* A meaningful alternative to suspension and/or expulsion of a student.” This is a Kentucky School Board Association (KSBA) required policy.

The Menifee County Academy (MCA) is a residential preparatory academy located on the campus of Menifee Elementary School. The program is funded by the Department of Juvenile Justice (DJJ), Kentucky Educational Collaborative for State Agency Children (KECSAC) and the local board of education funding. MCA is an accredited day treatment program that makes it possible for eligible students to earn a high school diploma. Students received individual and group counseling in addition to their recovery of credits and current online work. The special education teacher serving as director of MCA, Robby Johnson, is considered to also be part of the high school staff with the high school principal conducting walkthroughs at the Academy. In addition, Mr. Johnson contributed and uploaded evidence for the district 30-60-90 Day Plan based on the MCA KECSAC and DJJ audit results. The transition process is outlined in “Alternative School Protocols” named “Day to Day Operating Procedures.”

Challenging All Students to Succeed (CATS) Program serves as an intervention in order to recover a credit required for their overall academic credit requirements. CATS also provides an alternative instructional program three times per week at the Menifee High School campus following regular school hours to remediate academic performance, improve behavior, or provide enhanced learning experiences for students that cannot be addressed in a traditional classroom setting.

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

Based upon evidence review, required policies have been adopted and are housed online via the KSBA webpage. The Comprehensive District Improvement Plan (CDIP) included activities that target special education populations but there is limited evidence of implementation of these activities nor the use of evaluation methods to determine their impact.

Review of district documents showed evidence of a three year curriculum plan developed including K-12 expectations, an RTI implementation guide, effective grading practices and professional learning requirements. The 30/60/90 day plans also included action strategies for curriculum expectations (e.g., maps, pacing guides), monitoring and revisions. However, there was limited evidence to suggest how these curriculum documents have been modified or adjusted to meet the learning needs of special education populations. Additionally, interviews indicated one recent training for staff on co-teaching to support special learning needs; however, there was limited evidence to suggest district expectation for implementation or how the district will continue to support teachers in this area. Special education teachers are included in regular PLCs but there was limited evidence of their own opportunity to meet together to learn and discuss curriculum and instruction to specifically impact special education populations. Plans for an upcoming October meeting were mentioned in

interviews, but no specifics as to how this meeting will be structured to be more than compliance-driven are evidenced.

Based upon interviews and document review, there is limited evidence to support a comprehensive special education pre-referral system (Multi-tiered System of Support) that documents the intervention processes of a student before being referred for special education testing. One artifact was a document teachers complete after six weeks of intervention; however, teacher interviews indicated the absence of a Tier III program within schools.

### **How do you measure effectiveness of these processes?**

Interviews and document review evidence mechanisms of measuring effectiveness of the above processes. While teacher groups discussed the expectation of regular PLCs with an emphasis on data analysis, the district does not require a specific protocol but gives each school the autonomy to develop its own processes for measuring effectiveness. According to interviews and documents, the district and school administrators evaluated curriculum effectiveness by attending school level PLCs and offering feedback. School administrators also conduct walkthroughs in classrooms and give individual feedback based on the iPof.

Based on interviews with district office staff, school principals and document review, principal liaison meetings focus on a variety of instructional items (e.g., curriculum, direct explicit instruction, feedback and certified evaluation plan deployment). Multiple staff members stated significant change has occurred during the past two years around a common curriculum and instructional framework. Teachers credited school and district leadership with establishing expectations of a collaborative culture for this work. Teachers also stated notes and next steps for curriculum adjustments are documented throughout the year and changes to the curriculum occur at the end of each school year.

Interviews suggested there is discussion of student data at the formative or summative level. There was also evidence to suggest school and district leadership required professional learning groups to review specific data pieces such as iReady at the elementary and middle schools. While there was evidence to suggest that schools plan for how students will set performance goals, there was limited documentation to support a systematic approach that includes Tier II interventions. Conversely, the high school uses practice ACT assessments at grades 9 and 10 in reading and math to determine Tier II interventions.

All schools in the district have developed Direct Explicit Instruction (DEI) as the common instructional process in all classrooms. Teachers receive feedback related to the implementation of this process and teacher teams discuss aspects of instruction through data analysis during PLCs. Some teacher teams have implemented a PDSA process within their PLCs as a mechanism to support the implementation of DEI.



## **DEPLOYMENT**

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

Interviews indicated that DEI, the district wide instructional process, has been implemented. Interviews also indicated that DEI phases one through four were implemented over the course of the 2017-2018 school year. Training for the fifth phase occurred district-wide during professional learning opportunities provided by the district on August 2, 2018 as indicated by the Professional Learning Catalog for the 2018-2019 school year. DEI has been monitored by both the district and school administrators. At the school level, the iPof is used by administrators and instructional coaches as the monitoring tool leading to feedback being provided to teachers. PLC agendas and minutes provided evidence of the monitoring and discussion of classroom processes. There is also evidence provided of PLC protocols, agendas and minutes. Interviews and minutes evidenced that PLCs are monitored by school principals, instructional coaches and district personnel. Artifacts and interviews further evidence weekly PLCs to discuss data decks allowing teachers to present their data from the previous week's instruction.

## **LEARNING**

### **What processes are in place to use data and information to improve learning processes?**

The PLC protocols provided a process for teachers to review data to make improvements in curriculum, instruction and assessments to reduce or eliminate curriculum gaps. The process enabled teachers to engage their colleagues in conversations surrounding the data and taking ownership of the PDSA continuous improvement cycle to improve student achievement. There are opportunities for administrators to report and analyze data using quarterly reports and data dashboards. However, these are at various levels of implementation and impact on student achievement.

### **What evidence is there that these are working?**

District and school stakeholders indicated the schools have experienced multiple changes around curriculum and instruction in the past year. These changes emphasized the recent development of a common core curriculum and the adoption of a common instructional process (DEI) through the PLC process. There is minimal evidence to indicate these practices have translated into student state accountability performance or into the overall district/school accountability measures. Interviews indicated teachers have common language and common expectations of curriculum and instruction. Processes for improvement have been implemented; however, evidence of student learning has yet to confirm the effectiveness of these processes.

### **What data and information are used?**

Based on interviews and documents reviewed, K-8 classroom assessment data is used during weekly PLCs. District benchmark assessments are given three times per year through iReady for both reading and math. Benchmark assessment data is used to progress monitor individual students and identify intervention groups in varying degrees across the district.

Evidence at the high school suggested that teachers and administrators analyze summative assessment data to make improvements in the alignment and coherence of effective instruction to the level of engagement required of the standards. ACT mastery prep data is also implemented in the high school.

Walkthrough data is shared through the iPof instrument to monitor and evaluate DEI in teacher classrooms.

## **INTEGRATION**

### **How is the learning from each of the levels used to improve the overall system?**

Based on document reviews and interviews of building level administrators, teachers and district level leadership, evidence of a systematic, intentional process and protocol for improvement is in the awareness/implementation phase throughout the Menifee County School District. Instructional processes have been implemented across the district, but a system-wide analysis of impact on the system was not clearly evidenced. While the district level staff does use 30-60-90 Day Plans based on the CDIP, there is little evidence that the actionable steps are significantly impacting deficiencies in student learning.

#### **Instructional Management Recommendation:**

- Develop and implement a rigorous Tier III intervention system, at all grade levels within the district, to address the specific learning needs of students as identified through a comprehensive data analysis process.
- Review and align school improvement planning processes to eliminate unnecessary and redundant pieces of work at all levels of the system. Clearly define roles and responsibilities of key instructional leaders to maintain their focus on improving teaching and learning.
- Develop a clear system of district expectations for professional learning and supports for special education and regular education teachers teaching in a collaborative setting and for other safety nets for special education students that goes well beyond compliance issues into teaching and learning.

## **V. INSTRUCTIONAL MANAGEMENT- Career and Technical Education**

**a. Team Members:** Helen Jones, Karla Tipton

**b. Interviewed:** Educational Recovery Leader, High School Guidance Counselor, Agriculture Teacher, Family and Consumer Science Teacher

## **APPROACH**

### **Who is the leader of the curriculum and instructional processes in the district?**

The District has not identified a CTE coordinator at the district level. Interviews indicated that some staff members believe the guidance counselor is the CTE coordinator. Interviews indicated that the guidance counselor received an email regarding becoming the CTE coordinator, however she knew very little about the roles and responsibilities. Evidence and interviews indicated that little to no instructional support is being provided to the CTE programs.

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

A review of student transcripts revealed 40% of the students did not have the correct number of CTE credits to be identified as preparatory in the pathway. Also the transcripts showed that 30% did not have the correct number of attend hours, most of the students had less credits than reported. The records reviewed indicated that students were eligible for preparatory status in other pathways that were not marked in TEDS.

There is little to no evidence to indicate that course sequencing for pathways is being followed. Scheduling of CTE courses were not pathway driven. Interviews indicated that there is not a clear understanding around scheduling to ensure students are in the correct pathways.

### **How do you measure effectiveness of these processes?**

Interviews indicated that data is not being used to drive instruction, pathway development or recruitment. Only one staff member in the district has access to the Technical Education Database System (TEDS).

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

Observations indicated that there were as many as four different courses being taught during one class period. This practice does not allow for the necessary rigor to be devoted to each course. Little to no evidence indicates that students are consistently scheduled to support success for preparatory or completion status.

Interviews indicated that there are not processes in place to ensure that students are placed in CTE courses with the intent of completing a pathway. Interviews and observations indicated that most students are placed in CTE courses to fill an elective on the schedule.

**What evidences are there of alternative programming for students?**

Interviews indicated that CTE courses are often seen as a place to fill a spot on a student’s schedule. The course of sequence for several pathways are not followed. Interviews revealed that the scheduling of students in the CTE courses were based on the need to ensure that there were enough students to justify the class period.

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

Carl D. Perkins Career and Technical Education Act (2006) requires that each CTE pathway have an advisory council for each program of study. The advisory councils should include parents, students, administrators, and teachers in that program as well as representatives from business and industry. Based on interviews, each of the programs have an advisory council established, however they are not utilized as there is no evidence of agendas and meeting minutes.

**How do you measure effectiveness of these processes?**

Interviews indicated that the Agriculture program has established a strong recruitment process. 129 students were enrolled for the program compared to a total of 135 students enrolled in all CTE programs the year before.

**DEPLOYMENT**

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

Interviews and observations indicated that there is little understanding of the requirements to implement an effective CTE program. Some processes are in place for the deployment of various required activities relative to CTE. Interviews and observations indicated that the processes in place are not being implemented with fidelity (e.g., students are being identified as preparatory based on the number of credits earned but the actual credits do not count for the identified pathway).

**LEARNING**

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

Interviews and observations indicated that data is not being used to drive instructional change or to improve the overall CTE program.

### **What evidence is there that these are working?**

Observations indicated that the small number of students which are preparatory are receiving an industry certification.

### **What data and information are used?**

A review of transcripts indicated that only 10% of students identified as completers were actually completers, most were actually preparatory.

## **INTEGRATION**

### **How is the learning from each of the levels used to improve the overall system?**

There is little to no evidence to support that school or district leadership has a clear understanding of how to implement an effective CTE program.

There is little to no evidence to indicate that the school CTE leadership is utilizing the interest of students and the needs identified in the Labor Market Information (LMI) to ensure that the needed pathways are being developed.

### **CTE Recommendations:**

- Identify a CTE Coordinator and an additional person to receive TEDS training.
- Develop a process to ensure that the CTE Coordinator and the additional person monitor the data as required.
- Develop, implement and monitor processes that address data collection, data accuracy, finance and review of program standards by both the district and school.
- Develop, implement and monitor 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 for the program.
- District and School Leadership must develop an understanding of career pathways, and provide guidance to ensure effective program implementation.
- Develop a process that ensures all students enrolled in CTE pathways are moving toward transition readiness, not just taking courses.

- Reduce the number of Family and Consumer Science pathway offerings in order to strengthen the Culinary Pathway.
- Review the opportunity to offer Family Consumer Science Essentials for 8<sup>th</sup> graders.
- Review the opportunity to offer Money Skills as a fourth math credit to build the program.