

# FCMAT

FISCAL CRISIS & MANAGEMENT  
ASSISTANCE TEAM

## Inglewood Unified School District

July 2022

# PROGRESS REPORT









# **Inglewood Unified School District**

**Follow-up Review  
July 2022**







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# **Introduction and Executive Summary**







## Introduction

The Inglewood Unified School District was established in the early 1950s as the successor of the Inglewood School District, which originated in 1888. It encompasses nine square miles in Los Angeles County and is about 13 miles southwest of the city of Los Angeles. Inglewood Unified serves approximately 7,628 TK-12 students in 19 schools in the city of Inglewood and an adjacent section of unincorporated Los Angeles County (Ladera Heights). The district's schools include one child development center, five TK-6 schools, two P-8 schools, four TK-8 schools, one grades 7-8 middle school, two comprehensive high schools, one district-operated TK-8 charter school, one district-operated charter high school, one alternative education high school (9-12) and one adult education school. The district-operated TK-8 charter school has 659 students and the district-operated charter high school has 302 students who are included in the 7,628 students referenced above. Numerous independent charter schools are also in the district service area.

On September 14, 2012, the governor approved Senate Bill (SB) 533 (Chapter 325/2012), bringing the district under state receivership with a state-approved emergency appropriation of \$55 million to avoid fiscal insolvency. The district's previous management made efforts to avoid the takeover with last-minute expenditure reductions totaling approximately \$22 million, but after years of deficit spending, the district's structural budget imbalance was too large. The district was projected to have a negative cash balance by March 31, 2013. Stated reasons for fiscal insolvency included: overstating average daily attendance (ADA), understating California State Teachers' Retirement System payments, understating certificated salary expenses, continued deficit spending, and declining enrollment. State emergency appropriations are sized based on many assumptions. These emergency appropriations are not meant to solve the fiscal problem, but to allow time for the district to make the necessary reductions to correct the structural operating deficit.

The funds for the emergency appropriation (loan) to support cash flow in the district were initially to be issued, as provided for in the legislation, by the California Infrastructure and Economic Development Bank (I-Bank). The I-Bank typically would sell bonds to investors to raise the capital for this purpose. Temporary loans were made from the state's general fund to provide cash flow during the period before the I-Bank bonds were sold. Before they were sold, Assembly Bill (AB) 86, Statutes of 2013, was passed. This legislation superseded the previous I-Bank financing and instead authorized the district, through the California Department of Education (CDE), to request cash flow loans directly from the state's general fund in an amount not to exceed \$55 million at a much lower interest rate, saving the district millions of dollars over the life of the loan.

Of the \$55 million authorized, the district drew \$29 million from November 2012 through February 2013 because of negative cash flow projections, or 53% of the emergency state loan funding, leaving a balance of \$26 million available.

The 2021-22 first interim combined unrestricted and restricted revenues have decreased by \$15.9 million since budget adoption while the combined expenditures have increased by \$24.5 million, with an unrestricted ending fund balance projected at \$40.6 million. The district's multiyear financial projection (MYFP) showed a reserve for economic uncertainties of 3.05% for 2021-22, 3.01% for 2022-23, and 3.07% for 2023-24. However, the district also included an assigned amount of \$35.21 million in 2021-22, \$36.25 million in 2022-23 and \$35.17 million in 2023-24. The district projects to deficit spend \$1.18 million in the unrestricted general fund in fiscal year 2023-24.



The district has benefitted from additional ADA funding from the closure of two of its sponsored charter schools. These charter school renewal petitions were denied, and both charter schools ceased operations at the end of the 2019-20 fiscal year. Neither provided instruction in fiscal year 2020-21. For charters that closed in fiscal year 2019-20 and did not operate in 2020-21, SB 820 (Chapter 110/2020) provides to the sponsoring school district an increase in its ADA based on the ADA reported in 2019-20 by the now closed charter school. This was an increase of 827.5 ADA in fiscal year 2020-21 and significantly increased the district's Local Control Funding Formula (LCFF) apportionment. This windfall continued in 2021-22 and the benefit to the district's LCFF is approximately \$18.5 million between both the 2020-21 and 2021-22 fiscal years.

The district continues to experience declining enrollment; approximately 322 students left its schools for the 2021-22 school year. This represents an approximately 10,341 total student decrease (or 57.5%) since its 2003-04 high of 17,969 students. The district's 2021-22 first interim report enrollment projections for the 2022-23 and 2023-24 school years estimate continuing enrollment reductions of 536 and 310 for those years, respectively. This would bring the district's enrollment to approximately 7,092 students in 2022-23 and 6,782 in 2023-24. Unless the majority of the ADA from the closure of the two charter schools follows the district into 2022-23, it will face a steep decline in ADA, which will translate into a significant reduction in its LCFF apportionment in that year.

Although the district's 2021-22 first interim report shows a projected unrestricted general fund surplus of \$10.7 million in 2021-22 and a surplus of \$20.1 in 2022-23, it projects deficit spending of \$1.18 million in 2023-24. The district's fiscal stabilization plan (FSP) submitted with its first interim report includes ongoing expenditure reductions of \$4.6 million in 2021-22, and additional expenditure reductions and revenue enhancements totaling \$4.9 million in 2022-23 and \$1.1 million in 2023-24. Even though the district meets the required reserve for economic uncertainties, it needs to follow through with expenditure reductions and/or revenue enhancements outlined in its FSP to eliminate the operating deficit.

FCMAT continues to be concerned about external independent audit findings related to internal control weaknesses, as some are repeated in each of the last several years audited. However, the number of audit findings was reduced from 13 in 2019-20 to eight in 2020-21. The auditor issued a qualified opinion on the 2020-21 audit report because the district's accounting records were inadequate and supporting documents were unavailable to support the amounts reported in its financial statements for capital assets and depreciation.

Thus far, Inglewood Unified has not had to make further draws on the emergency appropriation because of the statewide implementation of the LCFF, legislative assistance provided under AB 1840 (discussed in the Changes to State Receivership section below) as well as state and federal coronavirus relief funds to further augment its revenue. However, the additional revenue alone will not resolve its solvency issues, which are exacerbated by declining enrollment and failure to adjust facility use to match enrollment.

Aside from the increasing costs of salaries and benefits, fiscal recovery efforts were also constrained in past years by ongoing costs to the general fund to cover the annual debt service payment of \$1.83 million on the state emergency appropriation, which began in November 2014 and was to end in November 2033. For the fiscal year 2018-19, the director of the California Department of Finance granted the district a one-time deferment on this payment. However, this is not debt forgiveness, which means the last loan payment will be adjusted to November 2034.



Under state receivership, the superintendent of public instruction (SPI) had historically assumed all the legal rights, duties, and powers of the governing board and appointed a state administrator to act as both the governing board and superintendent. This was the case until September 2018, when under AB 1840, the California State Legislature gave the local county superintendent the role formerly assigned to the SPI for this purpose. The district's five-member governing board continues to serve in an advisory role until the following two events occur:

- The district shows adequate progress in implementing the comprehensive review recommendations in the five operational areas of finance, human resources, community relations and governance, facilities, and pupil achievement.
- The county superintendent, with concurrence from the superintendent of public instruction and president of the state board of education, determines that the district has built sufficient capacity to self-govern.

Even when the governing board resumes control, a trustee will have stay-and-rescind authority until the loan is fully repaid to the state. The county superintendent's role of managing fiscal oversight during the period of state receivership continues to be a key element to the district's recovery since she must assess and approve budgets, receive interim reports and determine the district's fiscal status as either positive, qualified or negative. The county superintendent's role during state receivership is no different than its role during normal times of self-governance, but was expanded because of the passage of AB 1840. That expansion has brought multiple resources to bear in the district to assist in its recovery.

During the first months of state administration, the initial state administrator resigned because of a contractual dispute regarding a collective bargaining agreement signed without the consent of the CDE. The assistant superintendent of business services subsequently became the interim state administrator and remained in this position, filling a dual role, until July 1, 2013. On July 1, 2013, the state appointed a permanent state administrator, who was called a state trustee based on subsequent legislation, AB 86 (Chapter 48/2013). On October 15, 2015, a new state administrator was appointed and subsequently resigned on April 28, 2017, to accept a superintendent position at another school district. An interim state administrator was appointed and remained until the last state administrator assumed her position on August 16, 2017. She announced plans to retire and leave the district in October 2019 with a final retirement date of December 2, 2019. With this disclosure, the county office's deputy superintendent moved to the district's central office to assume the role of interim state administrator and assist in providing continuity in leadership upon the departure of the state administrator. According to the revisions in the selection of state administrators provided in AB 1840, FCMAT worked to provide the Los Angeles County superintendent of schools with a list of vetted candidates, and the current county administrator was appointed on November 8, 2019.

Although stability in staff responsible for maintaining position control has significantly improved the process, FCMAT continues to question the district's method in properly tracking vacant positions and their impact on the accuracy of budgets and financial projections, which can result in over- or underbudgeting.

During this review period, the district entered into negotiations on a successor agreement with the ITA. The ITA collective bargaining agreement included updates to various articles of the agreement. The district and ITA participated in IBB and representatives from both the district



and ITA indicated that the IBB process worked well. During this review period, California Professional Employees (CalPro) withdrew as the representative of the classified bargaining unit. At the time of FCMAT's fieldwork, classified employees were without representation, but subsequent to fieldwork, the classified employees elected to replace CalPro with California Teamsters Local 911.

The district continues to have regularly scheduled meetings with the ITA and the classified bargaining unit leadership to resolve issues at the lowest possible level, enhance communications, and build relationships.

The district placed a \$90 million general obligation bond called Measure GG on the ballot on November 6, 2012, and won 86.1% voter approval. The district issued \$30 million in bonds on July 16, 2013 to begin to address capital facilities' needs, and the bond proceeds were deposited into the district's building fund (fund 21). Because Measure GG was placed on the ballot as a Proposition 39 bond measure, expenditure of the funds requires the formation of a citizens' oversight committee, and the district formed this committee as required under Education Code Section 15282.

The district placed a \$240 million general obligation bond called Measure I on the November 3, 2020, ballot. The measure won with an 80.8% voter approval, and the proceeds are to be used to repair/upgrade classrooms, including instructional technology, vocational/career education, roofs, plumbing, security/fire safety; remove asbestos, lead paint, mold; provide safe drinking water; and acquire, construct, repair sites, facilities, equipment. Like Measure GG, this ballot measure was a Proposition 39 bond measure and requires the formation of a citizens' oversight committee. Since the last review, the district reformed its Citizens' Bond Oversight Committee (CBOC) that was originally assembled to provide oversight of the district's Measure GG bond. This committee now serves as a combined CBOC to also meet the requirement for the Measure I bond. The district has completed or is in the process of completing many projects that it has identified as top priority, where work would be performed using bond and Los Angeles World Airports (LAWA) impact mitigation funds.

At its November 18, 2015, regular board meeting, the then state administrator approved a districtwide facilities implementation master plan that identified the needs of each of its school sites, and a capital planning budget for facilities expenditures aligned with the district's instructional goals. An update was provided at the board's March 8, 2017 meeting; however, both plans had been shelved, and the district had rolled out several projects incrementally without the benefit of a comprehensive facilities master plan. The district updated its long-range school facilities master plan in November 2018, to reflect its annual capital planning budget and a proposed timeline. The district recently hired a consultant to develop a 2022 Facilities Master Plan.

Students and staff resumed in-person instruction for the 2021-22 school year. Even though progress was made on facilities projects, the district's capital facilities still have significant deterioration. School facilities visited by FCMAT were reasonably clean and free of debris and conditions that would create a fire or life hazard. The general landscape conditions, in highly visible areas, have improved.

The district's facilities capacity continues to be roughly twice as large as needed to house its total student enrollment, and most of the excess capacity is old and in disrepair. As a result, it must maintain its facilities on a maintenance budget that would be considered marginally



adequate for a district with half as many facilities. Before using its facilities funding, the district should consider aligning its student enrollment capacity with its current and projected student enrollment, which should be reflected in the update to its Facilities Master Plan. The district successfully consolidated two sites, Woodworth Elementary and Monroe Middle School, into one site. During this review period, the district acted to close Warren Lane Elementary at the conclusion of the 2021-22 school year. Continuing to match district facilities to student enrollment is critical to the fiscal recovery and solvency of the district.

The district has had seven state or county administrators/trustees during a 10-year period, creating instability in organizational development and inconsistency in developing and implementing long-range recovery plans. Because of the COVID-19 pandemic, SB 98 (Chapter 24/2020) omitted the district's eighth comprehensive review. This report is the district's 10th review and is based on the period from March 2021 to March 2022.

Since FCMAT's last review, a Los Angeles County Office of Education (LACOE) support team member has been added to support the county administrator in the role of associate superintendent and another to act as interim chief human resources (HR) officer. With a full team of executive cabinet members in place for most of this review period, the district has been able to make progress in establishing core structures to its departments; however, the improvements vary from department to department. High turnover continues in staff at the next level of administration.

The work the county administrator and her executive cabinet have accomplished during this review period is evidenced in the improvements observed by FCMAT and reflected in the scores below; however, budget and facility concerns remain. As the county administrator continues to focus on improvement and recovery, particular areas will require significant attention. Chief among these continue to be balancing the district's budget to achieve and maintain fiscal solvency; providing consistent, rigorous, effective first instruction; providing differentiated instruction; instituting a more structured system for monitoring classroom instruction; implementation of a coherent Multi-Tiered System of Supports (MTSS); using data to improve instruction; updating the district's and its district-operated charter schools' Local Control and Accountability Plans (LCAPs) including meaningful community partner engagement; and aligning them with the budget and updating and improving facilities. Also important are working with staff and the advisory board to identify procedures and programs that implement substantial improvements in the district's fiscal policies and practices; significantly increasing pupil achievement; improving pupil attendance; decreasing the pupil dropout rate; increasing parental involvement; continuing to attract, retain, and train a quality teaching staff; managing fiscal expenditures consistent with current and projected district revenues; instituting a plan to adjust facility use to match enrollment; and prioritizing and implementing facility improvements.

The county administrator, the cabinet and the advisory board have many critical roles and responsibilities in the district's recovery. The district requires continued and consistent leadership that has the ability and capacity to set priorities, implement systemic reform, engage the community, establish high expectations for student achievement, manage resources, ensure accountability and align practices. The district will remain in a perilous position without continuous, consistent and strong leadership, the execution of its multiyear recovery plan, implementation of the LCAP, development of a well-articulated plan for the district's future and improvement as reflected in the comprehensive review.



FCMAT's 2022 assessment indicates that the district has made progress in all five operational areas. Much of this progress can be attributed to the work of the county administrator and her executive cabinet as well as improvements to the function of the advisory board. Much work remains to be done to achieve full recovery, and that work will be difficult with any additional administrative turnover. Since FCMAT's fieldwork, the chief business official (CBO) has left for another district and another CBO has been hired.

## **Purpose**

The purpose of this report is to provide the district with the current results of an ongoing systemic and comprehensive assessment of the district's progress, including recommendations for improvement and recovery in the following five operational areas:

1. Community Relations and Governance
2. Personnel Management
3. Pupil Achievement
4. Financial Management
5. Facilities Management

This report provides data to the district, the county office, the community and the legislature concerning the district's progress in implementing the recommendations of the recovery plans and building its internal capacity so that the locally elected school board and staff can effectively manage the five operational areas to eventually exit state receivership and return to local board governance.

## **State Receivership**

On September 14, 2012, SB 533 (Chapter 325/2012) was signed into law. The bill authorized the appointment of a state administrator and provided a \$55 million emergency state loan. The legislation authorized FCMAT to complete comprehensive assessments of the Inglewood Unified School District and develop improvement plans in five operational areas. In addition, FCMAT was authorized to assist the state administrator in developing the first annual multiyear financial recovery plan required under paragraph (2) of subdivision (a) of Section 41327 of the California Education Code (EC). SB 533 further authorized FCMAT to do the following:

- Assist the state administrator in the development of the adopted budget and interim reports.
- Recommend to the state superintendent of public instruction any studies or activities that the state administrator should undertake to enhance revenue or achieve cost savings.
- Provide any other assistance as described in EC 42127.8.



SB 533 requires the Inglewood Unified School District to bear 100 percent of all costs associated with the emergency loan, including the activities of FCMAT.

SB 533 further intended that the state SPI, through the state administrator, work with the staff and advisory board to identify the procedures and programs that the district will implement to accomplish the following:

1. Significantly raise pupil achievement.
2. Improve pupil attendance.
3. Lower the pupil dropout rate.
4. Increase parental involvement.
5. Attract, retain and train a quality teaching staff.
6. Manage fiscal expenditures in a manner consistent with the district's current and projected revenues.

Also intended by SB 533 was for the SPI, through the state administrator, to do the following:

- Analyze the identified procedures and programs and, where applicable and appropriate, protect, maintain, and expand them as the budget of the school district allows. The state administrator shall report any findings applicable to this section to the superintendent of public instruction and the education committees of the legislature.
- To the extent allowed by school district finances, maintain, under the revised program, core educational reforms that will lead to districtwide improvement of academic achievement, including, but not necessarily limited to, educational reforms targeting underperforming and program improvement schools and other reforms that have demonstrated measurable success.

### **Changes to State Receivership – AB 1840**

AB 1840 (Chapter 426/2018) passed the legislature on August 31, 2018, as a budget trailer bill and became effective on September 17, 2018. Among other provisions, AB 1840 provides for several changes in the oversight of fiscally distressed districts and sets forth specific requirements for the district in exchange for providing financial resources under certain circumstances.

AB 1840 changes the former state-centric system to be more consistent with the principles of local control. Several duties formerly assigned to the SPI are now assigned to the county superintendent, with the concurrence of the SPI and the president of the State Board of Education. While AB 1840 does not change the definition of or criteria for fiscal insolvency, it does change the structure of how fiscally insolvent districts are administered once a state emergency appropriation has been made.



Under AB 1840, the county administrator assigned to the district now reports to the Los Angeles County Superintendent of Schools. If the current county administrator elects to not continue, or a determination is made by the county superintendent that the county administrator should be replaced, the appointment of the next county administrator would follow the provisions of AB 1840, namely, 1) be selected from a list of candidates identified and vetted by FCMAT, and 2) be appointed jointly by the county superintendent, SPI and president of the State Board of Education.

Additionally, AB 1840 established Education Code Section 42161, which states the following:

- (a) For the 2018–19 fiscal year, the Inglewood Unified School District shall do both of the following:
  - (1) Meet the requirements for qualified or positive certification for the school district’s second interim report pursuant to Article 3 (commencing with Section 42130) of Chapter 6.
  - (2) Complete comprehensive operational reviews that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability.
- (b) Beginning with the 2019–20 fiscal year, the Budget Act shall include an appropriation for the Inglewood Unified School District, if the school district complies with the terms specified in subdivisions (a) and (c), in the following amounts:
  - (1) For the 2019–20 fiscal year, up to 75 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.
  - (2) For the 2020–21 fiscal year, up to 50 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.
  - (3) For the 2021–22 fiscal year, up to 25 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.
- (c) Disbursement of funds specified in subdivision (b) shall be contingent on the Inglewood Unified School District’s completion of activities specified in the prior year Budget Act to improve the school district’s fiscal solvency. These activities may include, but are not limited to, all of the following:
  - (1) Completion of comprehensive operational reviews that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability.



- (2) Adoption and implementation of necessary budgetary solutions, including the consolidation of school sites.
  - (3) Completion and implementation of multiyear, fiscally solvent budgets and budget plans.
  - (4) Qualification for positive certification pursuant to Article 3 (commencing with Section 42130) of Chapter 6.
  - (5) Sale or lease of surplus property.
  - (6) Growth and maintenance of budgetary reserves.
  - (7) Approval of school district budgets by the Los Angeles County Superintendent of Schools.
- (d) Funds described in subdivision (b) shall be allocated to Inglewood Unified School District upon the certification of the County Office Fiscal Crisis and Management Assistance Team, with concurrence from the Los Angeles County Superintendent of Schools, to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance that the activities described in subdivision (c), as specified in the prior year Budget Act, have been completed. Additionally, by March 1 of each year, through March 1, 2021, the County Office Fiscal Crisis and Management Assistance Team, with concurrence from the Los Angeles County Superintendent of Schools, shall report to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance the progress that Inglewood Unified School District has made to complete the activities described in subdivision (c), as specified in the prior year Budget Act.
- (e) The activities described in subdivision (c) shall be determined in the annual Budget Act based on joint recommendations from the County Office Fiscal Crisis and Management Assistance Team and the Los Angeles County Superintendent of Schools. These recommendations shall be submitted to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance by March 1 of each fiscal year, through March 1, 2021, in conjunction with the certification described in subdivision (d).
- (f) Until June 30, 2019, the Superintendent may waive the reimbursement determination specified in Section 18054 of Title 5 of the California Code of Regulations for Inglewood Unified School District's 2016–17 fiscal year California state preschool program contract in order to resolve the school district's outstanding child development reimbursement liability to the state.



## **The Return to Local Governance**

Assembly Bill 1840 also includes revisions to Senate Bill 533 of the requirements for the district's return to local governance. As a condition of the emergency apportionment, the county superintendent of schools, in consultation with FCMAT, the SPI and the president of the State Board of Education, shall determine the level of improvement needed based on the FCMAT comprehensive review standards before local authority is returned. (EC 41327.1[c])

EC 41326 (f) indicates that the authority of the county superintendent of schools, the SPI, the president of the state board or his or her designee, and the administrator, under this section shall continue until all of the following occur:

- (1) (A) After one complete fiscal year has elapsed following the qualifying school district's acceptance of an emergency apportionment as described in subdivision (a), the administrator determines, and so notifies the county superintendent of schools, the SPI, and the president of the state board or his or her designee, that future compliance by the qualifying school district with the recovery plans approved pursuant to paragraph (2) is probable.  
  
(B) The county superintendent of schools, with concurrence from both the SPI and the president of the state board or his or her designee, may return power to the governing board of the qualifying school district for an area listed in subdivision (a) of Section 41327.1 if performance under the recovery plan for that area has been demonstrated to the satisfaction of the county superintendent of schools, with concurrence from the SPI.
- (2) The county superintendent of schools, with concurrence from the SPI, has approved all of the recovery plans referred to in subdivision (a) of Section 41327 and the County Office Fiscal Crisis and Management Assistance Team completes the improvement plans specified in Section 41327.1 and has completed a minimum of two reports identifying the qualifying school district's progress in implementing the improvement plans.
- (3) The administrator certifies that all necessary collective bargaining agreements have been negotiated and ratified, and that the agreements are consistent with the terms of the recovery plans.
- (4) The qualifying school district has completed all reports required by the county superintendent of schools and the administrator.
- (5) The county superintendent of schools, with concurrence from the SPI, determines that future compliance by the qualifying school district with the recovery plans approved pursuant to paragraph (2) is probable. (Education Code Section 41326[f])

## **Comprehensive Review Process**

In preparation for the first comprehensive review in 2013, FCMAT updated the legal and professional standards to ensure continued alignment with industry best practices and with applicable state and federal law, including the California Education Code. The standards, which will continue to be used for the annual updates, are applicable to all California school districts. FCMAT monitored the use of the standards during each assessment to ensure that they were



applied fairly and rigorously. The eighth review was omitted pursuant to SB 98, Section 102 due to the COVID-19 pandemic. This July 2022 report includes hundreds of recommendations for improvement and recovery related to the identified standard. Recommendations for recovery are designed and intended to affect functions directly at the district, school site and classroom level. Implementing the designated standards and recommendations with this type of depth and focus will result in improved pupil achievement, financial practices, personnel procedures, community relations and facilities management and will hasten the return to local control and governance, which is one of the primary objectives of the recovery process.

Prior to the initial assessment, the director of the CDE's Fiscal Services Division and FCMAT conferred and selected priority standards to assess the district's condition in the five operational areas. These priority standards are divided among the five operational areas as follows: 20 community relations and governance standards; 28 personnel management standards; 31 pupil achievement standards; 43 financial management standards; and 33 facility management standards (two of which are no longer applicable). Priority standards were selected to ensure that the report measures the district's progress toward meeting legal and regulatory requirements and restoring the essential functions of an effective district.

This comprehensive review process is a deficit-analysis model. The process of systemic assessment, prioritization and intervention lays the foundation for increasing the district's capacity and productivity by establishing a baseline measurement against which future progress can be measured. The process also serves to engage advisory board members, parents, students, staff and the community in a partnership to improve student learning and engage and inform them about the LCAP. Each annual comprehensive review report will measure progress with a numerical rating and a summary of the district's progress in the identified priority standards.

A recovery process of this magnitude is a challenging, multiyear effort. The county administrator and the district will need to select priority areas on which to focus their efforts during each year of recovery. Understandably, equal progress will not be made in all operational areas as time progresses. The district continues to address issues identified during fieldwork; in some cases, FCMAT was able to report on progress that occurred after the team's visit. This report also discusses standards and operational areas of deficiency that the district was in the process of addressing during fieldwork. At the time of this report's publication, the district continued to work on a number of the concerns addressed in this report and thus may have made progress that is not reflected in this document.

FCMAT acknowledges and extends its thanks to the county administrator, the district's advisory board and staff, the community and the Los Angeles County Office of Education for their assistance and cooperation during this ongoing review process.

## **Study Guidelines**

FCMAT's approach to implementing the statutory requirements of SB 533 is based on a commitment to an independent and external standards-based review of the district's operations. FCMAT performed the assessment and developed the improvement plans in collaboration with other external providers. Professionals from throughout California contributed their knowledge and applied the legal and professional standards to the specific local conditions found in the Inglewood Unified School District. Before working in the district, FCMAT adopted five basic tenets to be incorporated in the assessment and recovery plans. These tenets were based on



previous assessments conducted by FCMAT in school districts throughout California and a review of data from other states that have conducted external reviews of troubled school districts. The five basic tenets are as follows:

### **1. Use of Professional and Legal Standards**

FCMAT's experience indicates that for schools and school districts to be successful in program improvement, the evaluation, design and implementation of improvement plans must be standards-driven. FCMAT has noted positive differences between an objective standards-based approach and a nonstandards-based approach. When standards are attainable and clearly communicated and defined, there is a greater likelihood they will be measured and met. The standards are the basis of the improvement plans developed for the district.

To participate in the review of the Inglewood Unified School District, providers were required to demonstrate how they would incorporate the FCMAT identified standards into their work. Although the standards were identified for the comprehensive review of the district, they are not unique to this district and could be readily used to measure the success of any school district in California. Every standard was measured using a consistent rating format, and each standard was given a scaled rating from zero to 10, indicating the extent to which it has been met. Team members met to discuss findings and test for inter-rater reliability.

Following are definitions of terms and the rubric used to arrive at the scaled scores. The purpose of the scaled ratings is to establish a baseline against which the district's future gains and achievements can be measured.

#### **Not Implemented (Scaled Score of 0)**

There is no significant evidence that the standard is implemented.

#### **Partially Implemented (Scaled Score of 1 through 7)**

A partially implemented standard has been met to a limited degree; the degree of completeness varies as follows:

1. Some design or research regarding the standard is in place that supports preliminary development. (Scaled score of 1)
2. Implementation of the standard is well into the development stage. Appropriate staff are engaged, and there is a plan for implementation. (Scaled score of 2)
3. A plan to address the standard is fully developed, and the standard is in the beginning phase of implementation. (Scaled score of 3)
4. Staff are engaged in implementing most elements of the standard. (Scaled score of 4)
5. Staff are engaged in implementing the standard. All standard elements are developed and are in the implementation phase. (Scaled score of 5)
6. Elements of the standard are implemented, monitored and becoming systematic. (Scaled score of 6)



7. All elements of the standard are fully implemented and are being monitored, and appropriate adjustments are taking place. (Scaled score of 7)

### **Fully Implemented (Scaled Score of 8 through 10)**

A fully implemented standard is complete and sustainable; the degree of implementation varies as follows:

8. All elements of the standard are fully and substantially implemented and are sustainable. (Scaled score of 8)
9. All elements of the standard are fully and substantially implemented and have been sustained for a full school year. (Scaled score of 9)
10. All elements of the standard are fully implemented, are being sustained with high quality, are being refined, and have a process for ongoing evaluation. (Scaled score of 10)

## **2. Conduct an External and Independent Assessment**

FCMAT used an external and independent assessment process to develop the assessment and improvement plans for the district. This report presents findings and improvement plans based on external and independent assessments conducted by FCMAT staff, separate professional agencies, and independent consultants. Collectively, these professionals and consultants constitute FCMAT's providers in the assessment process. Their external and independent assessments serve as the primary basis for the review's reliability, integrity and credibility.

## **3. Utilize Multiple Measures of Assessment**

For a finding to be considered valid, the same or consistent information is needed from multiple sources. The assessments and improvement plans were based on such multiple measures. Testing, personal interviews, group meetings, observations, and review and analysis of data all added value to the assessment process. The providers were required to use multiple measurements and confirm their findings from multiple sources as they assessed the standard. This process allowed for a variety of methods of determining whether the standards were met. All school district operations that affect student achievement (including governance, fiscal, personnel and facilities) were reviewed and included in the improvement plan.

## **4. Empower Staff and Community**

Senate Bill 533 requires that the recovery plan include specific training for advisory board members and staff who have personnel and management policy-making and advisory responsibilities to ensure that the district's leadership team has the knowledge and skills to carry out its responsibilities effectively. The success of the improvement plans and their implementation depend on an effective professional and community development process. For this reason, empowering staff and the community is one of the highest priorities and emphasizing this priority with each of the five teams was critical. Thus, the report consistently calls for and reports progress on providing training for board advisory members, staff and administrators.



Of paramount importance is the community's role in local governance. The lack of parental involvement in education is a growing concern nationally. Re-engaging parents, teachers and support staff is vital to the district's success. Parents in the district care deeply about their children's future and want to participate in improving the school district and enhancing student learning. The community relations section of this report provides recommendations for engaging parents and the community, a significant focus of the LCAP process, in a more active and meaningful role in their children's education. It also provides recommendations for engaging the media in this effort and increasing the number and frequency of media reporting on the district's recovery progress.

## **5. Engage Local, State and National Agencies**

It is critical to involve various local, state and national agencies in the district's recovery; the engagement of state-recognized agencies and consultants in the assessment and improvement process emphasized this. The CDE, city and county interests, and professional organizations have expressed a desire to assist and participate in the district's recovery.

### **Study Team**

The study team was composed of the following members:

#### **For FCMAT:**

Shayleen Harte, Deputy Executive Officer

Leonel Martínez, FCMAT Technical Writer

#### **For Personnel Management:**

School Services of California, Inc.

#### **For Pupil Achievement:**

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**For Governance and Community Relations:**

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**For Facilities Management:**

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Jack Colvard, FCMAT Consultant

\*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT.



## Summaries of Findings and Recommendations in Each of the Five Operational Areas

The full report includes all the various findings and recommendations for fiscal and operational recovery in five operational areas. Each finding and recommendation addresses a previously identified professional or legal standard. Following is a summary of the major findings and recommendations for each operational area, which are presented in greater detail in the body of this report.

This assessment is the product of data collection and analysis of the district's status at a specific point in time since state administration began. It is important to note that the ratings of the first report produced July 2013 indicated the district's status prior to state administration. The second through the tenth reports have each been based on the district's status from the prior year's rating date to the next year's rating date, except for the district's eighth report which was omitted according to SB 98, Section 102 due to the COVID-19 pandemic. This report is the district's tenth comprehensive review, will be dated July 2022 and is based on the district's status since July 2021. The Tables of Summary Scores below provides not only the average score for each operational area of the report but also provides the number of standards in which scores were under a four. While past performance and future plans are acknowledged in portions of the report, they were not considered in the application of FCMAT's rating rubric.

The assessment team began fieldwork the last day in January 2022 and concluded in late-March 2022. The district has addressed some preliminary findings reported during the assessment and is benefiting from the assessment team's ongoing feedback.

### Tables of Summary Scores

Operational Area	July 2013		July 2014		July 2015		July 2016		July 2017	
	Average Score	Standards Under 4	Average Score	Standards Under 4	Average Score	Standards Under 4	Average Score	Standards Under 4	Average Score	Standards Under 4
Community Relations/Governance	1.05	20	0.45	20	1.40	17	3.78	8	4.85	4
Personnel Management	1.46	26	1.36	27	2.82	18	4.00	8	5.43	2
Pupil Achievement	3.23	19	2.03	28	2.87	25	3.32	24	3.68	21
Financial Management	1.19	41	1.33	40	1.95	33	2.16	34	2.44	33
Facilities Management	2.24	29	2.59	27	3.81	17	3.94	16	4.65	9

Operational Area	July 2018		July 2019		July 2020	July 2021		July 2022	
	Average Score	Standards Under 4	Average Score	Standards Under 4		Average Score	Standards Under 4	Average Score	Standards Under 4
Community Relations/Governance	5.50	2	6.20	1		7.05	0	7.80	0
Personnel Management	6.32	1	6.60	1	Omitted per SB 98,	6.57	2	6.68	1
Pupil Achievement	3.94	17	3.87	16	Section 102 due to	3.87	20	4.48	11
Financial Management	3.28	25	3.81	20	COVID-19 pandemic	3.70	23	4.26	16
Facilities Management	5.29	7	5.13	7		4.71	11	5.16	8



## Community Relations and Governance

The community relations and governance section of the comprehensive report assessed the Inglewood Unified School District on 20 FCMAT standards in six categories. The district received a mean rating of 7.80, with 13 standards fully implemented, with a rating of eight through 10; and seven standards partially implemented, with a rating of five through seven.

The district has continued to face a lack of continuity because of frequent leadership changes, one of the largest shifts occurring during the 2019-20 school year. With the passage of AB 1840, a county administrator was appointed in November 2019 and she has been building on the established work of her predecessor and augmenting that work with new policies and procedures. FCMAT has continued to observe progress in community relations and governance under her leadership.

This portion of the review focuses on March 2021-March 2022 as the reporting period, with the last completed review having spanned March 2020-March 2021. The county administrator has restructured the organization several times since being appointed. During the 2021 review, Information Technology (IT) was moved to Educational Services, and Student Services became Student Services and Operations overseen by a newly created chief operating officer (COO). The maintenance, operations, and transportation functions were moved to this department and were directly overseen by an interim deputy chief maintenance and operations officer, although the Business Services Department retained oversight of facilities and construction related to bond projects under the direction of a newly hired deputy chief construction management officer. The deliberate vacancy of the executive director, school and community relations position necessitated the support of the LACOE staff to support the broader district marketing and communications efforts.

The following changes in administration and the organization occurred during the current review period:

- A LACOE support team member was added to support the county administrator in the role of associate superintendent.
- Maintenance, operations, and transportation, along with its deputy chief maintenance and operations officer, were moved back under the direct supervision of the chief business official (CBO), eliminating the deputy chief construction management officer.
- The COO now provides oversight only to student support services.
- The former chief HR officer resigned shortly after the last review and was replaced by a LACOE support team member on an interim basis.
- The IT Department was divided, with the executive director of IT reporting to the CBO, and the director of educational technology reporting to the chief academic officer (CAO).

The executive director, HR also resigned, and the position is not being filled. The county administrator has created an executive director of compliance that is intended to manage compliance and perform the risk management functions of the former executive director. While it appears, given the job duties, that the position will be housed under HR, the organizational chart shows the position reporting directly to the county administrator.



The district has filled the executive director of communications position (formerly the executive director, school and community relations).

This turnover of key personnel is directly attributable to relatively low district compensation, combined with a high stress, high demand atmosphere and other problems inherent to a district declining in enrollment and under state receivership. Many candidates who apply for various administrative-level positions have not previously held equivalent positions. Given limited resources, the district necessarily hires inexperienced individuals and provides the necessary training. The district also augments titles for existing job classifications (e.g., the current chief HR officer title in contrast to the former executive director of HR) to attract candidates. This takes time and district resources, and after a short amount of time, the individuals often accept employment at other districts with higher compensation and greater work-life balance. This is a further drain on the district and does not enable it to develop a solid, sustainable foundation.

Constant turnover in administration has plagued the district since it entered receivership and is of serious concern. These personnel and organization structure changes inhibit the district's ability to provide a stable, functioning, and effective organization, which is taxing to the staff. Frequent changes in staff, the chain of command, and procedures are disruptive to the organization and make it vulnerable to missing deadlines and/or leaving major tasks inadvertently undone. Lastly, the loss of long-term personnel who were loyal to the district for years under state receivership has been disconcerting to many.

The district has made progress in community relations and governance since the last review and has continued to reinforce sound practices in board roles/boardmanship and board meetings. All advisory board members, as well as the county administrator, have completed the Masters in Governance program offered by the California School Boards Association (CSBA). The county administrator has continued to provide the advisory board with opportunities to participate in district governance, including expanding their presence in closed session and creating subcommittees to provide additional input on district operational matters.

The district still faces many issues highlighted in prior reports. Enrollment continues to decline, decreasing from approximately 18,000 in 2003-04 to approximately 7,628 in 2021-22. Forecasts indicate that this decline will continue, with the loss of approximately 300-500 students each year. While many of the state's school districts have declining enrollment, the number of district students is decreasing faster than its neighbors.

Of continuing concern is the balance between solving financial problems and building quality programs. While the implementation of LCFF has assisted the district, it cannot recover fiscally or educationally unless it can, at a minimum, stabilize its enrollment and adjust facility use to match enrollment and staff accordingly. Both LACOE and the California Collaborative for Educational Excellence (CCEE) are providing additional support to the district via training, dedicated staff, and other supports. The legislature passed AB 1840, which provides an apportionment when certain conditions are met. The district received its first apportionment in 2019-20 and its second in 2020-21. Further, additional funding was provided to the district in 2020-21 and 2021-22 due to the closure of two charter schools operating within the district's boundaries as well as one-time state and federal pandemic funding. This improved the district's fiscal condition to the extent that it did not qualify for AB 1840 financial relief in 2021-22. For the first time in 11 years (since 2008-09), the district filed a positive certification at its 2019-20 second interim report and



has continued to do so. While this has helped improve staff morale, the positive fiscal outlook is partially based on the one-time state and federal relief from the COVID-19 pandemic.

A closer look at the district's 2021-22 first interim report multiyear projection shows that it still faces a structural deficit in 2023-24 and must continue to identify cuts and reductions via its FSP. Further, the district is still dealing with additional requirements from the various review agencies, which places an added load on staff. The district continues to face fiscal pressures, declining enrollment, low compensation, and a mix of insufficient staffing in some areas and excessive staff in others; combined with small educational and fiscal victories, this increases the likelihood of continued turnover of key staff.

The district has authorized numerous independent and district-operated charter schools, and these schools continue to make up a large segment of the community's school-age population. The county administrator has taken steps to curb their proliferation with revisions to the board policy on charter school authorization and stronger review and oversight of new/renewal charter school petitions and existing charter schools. In addition, AB 1505 (Chapter 486/2019) with provisions that became effective on July 1, 2020, provides additional reasons for the denial of a new charter school petition. One reason is specifically geared toward assisting authorizing school districts to deny new charter schools if it is not "positioned to absorb the fiscal impact of the proposed charter school." This is determined based on several factors, including if a district is under state receivership. While this will provide the district some relief regarding new charter schools, it does not affect current charter schools operating within the district's boundaries. For existing charter schools, strong oversight is critical, and the county administrator must continue to ensure that all charters have current agreements with the district and that oversight responsibilities are completed according to law.

A major part of this review focuses on building the organization's capacity so the elected board can eventually resume governance. During the 2018 review, the district completed the transition to elections by trustee area instead of at large, which affected the term end dates for board members. Elections are in November in even years, and new board members are seated in December with terms of four years. Board turnover is already a factor. Three new board members were seated just prior to the beginning of the 2021 review due to resignations. The new members had been on the advisory board for slightly more than a year at the time of FCMAT's fieldwork. According to the district's website, the terms for four of the existing board members, including the three newly seated members, expire this year, leaving only one current board member's term continuing through 2024.

Since the board is advisory, the day-to-day operations will likely not be greatly affected by any new changes. The district has shown that it has protocols for training new board members and integrating them into the district and their roles. When local governance resumes, the governing board and the administration will be assigned with maintaining functional relationships and sharing board norms. Most importantly, the district administration needs to continue establishing and supporting policies that reduce staff turnover and maintain consistency in operations for ongoing viability.

Though work remains, the district has made progress in written, comprehensive plans to provide guidance to district staff, the advisory board, and the public. It has updated board policies and regulations, is producing a monthly Progress Report, has a strong marketing/communications team, is establishing sustainable protocols, and has a highly functioning advisory board that many staff indicated is the best the district has had. Further, the relationship between the administration



and the advisory board is strong, which is critical as the district moves forward. All are signs that the district is building a solid foundation to govern in years to come.

The COVID-19 pandemic continues to affect all districts in California and across the nation. The district continues to provide instruction and services while navigating this unfamiliar terrain. The full expenditure of one-time state and federal dollars and the return to “normal” will be another obstacle the district will have to face, and more adjustments will be needed to keep moving toward organizational and fiscal stability.

## **Communication**

The district has continued to make strides in its communications, broadening its focus to both internal and external efforts. The executive director of communications position was filled in February 2022 and has been assigned to lead the Strategic Marketing Committee as well as other district messaging. The executive director will be responsible for providing a consistent district message and should handle all external inquiries, in consultation with the county administrator, as needed. The district’s website has been updated and continues to increase its functionality. The district continues to make progress on addressing the website deficiencies that have been noted in several of the last reviews. While some refinement is needed, the district has obviously made proactive efforts to ensure all data is current. In addition, videos continue to be created by district staff and students and uploaded to the website that feature the district and its students, among other relevant topics.

The district continues to distribute bulletins, press releases, and positive news stories, as well as the weekly county administrator’s message. More varied modes of communication are used, including a newsletter, phone and email “blasts,” and posts via Facebook and other social media platforms. Additionally, the district’s website has become a powerful means of distributing information and a centralized hub for the community and staff. These communications provide public-relations information as well as substantive details on the district’s day-to-day status, which has become even more critical during the pandemic. The district has made a concerted effort to involve all those affected, including employees and community members. Staff continues to make virtual presentations to school sites and at advisory board meetings on the budget and fiscal health and obstacles.

Internal communication to staff and administrators continues to improve. No staff expressed a lack of information as they are contacted through multiple media. While some staff still note that information is not always consistent across the various sources, district leadership has made efforts to ensure all staff are reached through email, postings on the website, and other social media, as well as providing information to site administration for dissemination. Staff at all levels are aware of the county administrator’s willingness and efforts to communicate with everyone in the organization.

The district should continue its internal communication efforts, ensuring that school site staff receive communications. Staff have also become more active consumers by seeking information and not simply waiting for it. Many staff interviews indicated that they frequently seek and acquire information from the district’s website. The administration focused its efforts on moving all resources to the district’s website where it is available to all staff. This continues to be a work in progress. Each individual department should continue to focus on creating procedure manuals, forms, etc. that can be uploaded to the website for its various job functions to ensure continuity,



especially given the continued staff turnover. Written procedures will allow day-to-day functions to continue when leadership or line staff change.

It is important for the county administrator and executive cabinet to continue to keep the employees and the advisory board informed. While the district is working with various oversight agencies, providing those affected with information about new developments, as well as those being considered, is the key to continuing to build trust and acceptance. The relationship between the county administrator and the advisory board is strong, and advisory board members expressed their trust in the current administration and its willingness to actively involve the advisory board in all matters related to operations. This is crucial since the district's short- and long-term success relies on the advisory board, as well as its employees, knowing they are a part of the process, understanding the reasons decisions are made, and realizing these decisions are in the district's best interest.

### **Parent/Community Relations**

Based on interviews with staff and parents, and review of agendas, flyers, calendars, sign-in sheets, newsletters, and other material, the district continues to have a strong focus on parent involvement. The district is in the process of establishing parent centers, supported by site-assigned community liaisons, at each school site. Between these site-based parent centers, the districtwide parent center, and website resources, the district offers classes, educational opportunities, training, and supports the various school site parent groups. Parent involvement decreased over the last two years with the pandemic and the transition to a virtual environment, but the district continues to encourage participation and offer opportunities for involvement. The school sites have active school site councils (SSCs) and advisory committees, which were provided with training and other workshops to encourage parent participation. Several school sites have or have had Parent Teacher Organizations (PTOs) or Parent Teacher Associations (PTAs), to promote active support and involvement. Despite these efforts, parental involvement continues to vary from school to school and is low at many sites with school site leadership playing a critical role to improve parental involvement. The district continues to make efforts to reach all parents utilizing various forms of communication. The parents interviewed all noted that they receive information, but acknowledged that could be because of their involvement in specific site or district groups (e.g., PTA, PTO, parent advisory council), the parents' general interest and seeking out of information, and the district more actively ensuring all parents receive information given the pandemic.

The advisory board members have consistently attended board meetings during this review period, and the district continues to recognize parents, staff, and students during the first part of the board meetings. Interviews with staff and the advisory board members indicate that the advisory board is building community relations by attending school events and initiating and attending community gatherings, as allowed and modified to meet the current situation. Further, the advisory board and members of the district administration have continued to make a concerted effort to communicate with the larger Inglewood community. For example, the county administrator's weekly message is regularly featured in the local Inglewood Today newspaper, and the interagency committee with the city of Inglewood continues to meet to better collaborate on ways the city can support the district. These efforts should continue to be encouraged as they assist the district in building strong community connections.



Despite the district's efforts to ensure broad communication beyond district staff, parents, and students, that information sometimes does not reach all parties. The district convened a School Closure/Consolidation Committee to recommend schools for closure/consolidation. Committee members were selected based on an open application process and six public meetings were held. The district's website has a page dedicated to the committee and includes agendas, meeting minutes, video recordings, and other information. The work of the committee was also shared at various board meetings. However, subsequent to the decision to close Warren Lane Elementary in 2022-23, a meeting was held for the parents of students who will be displaced. Some community members voiced discontent because they were not aware the school was scheduled for closure.

Because of the district's declining enrollment, it has been clear for several years that school closures/consolidations are necessary to ensure its continued fiscal solvency. The district's enrollment has decreased by more than 50% over the last 18 years. While careful planning is needed with any school closure, continuing to operate the same number of underutilized school sites for an undefined number of years poses a financial strain on the district in facilities and in the number of classified staff needed to maintain them, as well as certificated staff to provide instruction to a smaller and smaller cohort of students. Legislation passed by the state and the FCMAT's annual reviews have reinforced the need to decrease the number of personnel and facilities to match the district's smaller enrollment. While the closures/consolidations are necessary, and it is well within the county administrator's purview and responsibility to ensure the district remains a going concern, the community will likely not be happy or supportive with every decision. The entire process to analyze and determine which schools should be closed, consolidated or otherwise reconfigured, should be transparent and fully communicated to all community partners, ensuring that notifications and information for all meetings and closure considerations are disseminated broadly. The School Closure/Consolidation Committee should create and recommend an overall plan that considers all schools and facilities with a phased implementation for the county administrator to consider. The advisory board members should actively participate and can help with outreach to the community.

Education Code Section 52060 requires consultation with various groups, including parents, in the adoption of a LCAP. A review of documentation provided and interviews with staff indicates that engagement of community groups has become a year-round process with the number and frequency of meetings determined by the development phase of the LCAP. However, the district's LCAP webpage, while including information about the LCAP itself, does not provide surveys or mention the process for the development of the 2022-23 LCAP.

The Education Code is clear that charter schools must develop and submit their own LCAPs separate and apart from their authorizing districts. For the first time, evidence was provided that the district-operated charter schools completed LCAPs for the 2021-22 school year, which are posted on the district's website as required by law, and staff indicated they are developing LCAPs for the 2022-23 school year. It is imperative that the district continue to work with the district-operated charter schools to develop their own LCAPs and post them on the school's and district's website. The district also needs to post on its website the LCAPs, or provide a link, for all its authorized charter schools.



## **Community Collaboratives, LEA Advisory Committees, and School Site Councils**

The SSCs, the English Learner Advisory Committee (ELAC)/District English Learner Advisory Committee (DELAC), and the PTA continue to be active, although participation has decreased because of the pandemic and virtual environment. Training should continue to be provided annually to parents/members of SSCs since membership will change from year to year.

For several years, the FCMAT reviews have urged the district to adjust its School Plan for Student Achievement (SPSA) schedule to coincide with the school/fiscal year. The plans have historically been approved in February of the respective fiscal year providing little time for school sites to spend their allocated funds. To implement this recommendation, the school sites and district did not develop or approve SPSAs for the 2021-22 fiscal year and instead extended the existing 2020-21 SPSAs through the end of the 2021-22 fiscal year. The Education Code is clear that a district is required to allocate Title I funds to school sites with at least 75% free and reduced-price meal eligibility and that a school site cannot expend allocated funds without first developing and approving a SPSA. The district needs to address this issue to ensure continued allocation of federal Title I funding.

The district has established several districtwide, broad-based committees or councils to provide advice on critical issues and operations. These include a standing CBOC that focuses on facilities and the district's bond program, the DELAC, the LCAP Advisory Committee, the School Closure/Consolidation Committee, the Strategic Marketing Committee, the Budget Advisory Committee, the Board Policy Committee, the Inter-governmental Committee, the Child Development Center Parent Collaborative Committee, and the Inglewood/Airport Area Chamber of Commerce Education Committee. In addition, the county administrator established both a parent advisory committee and student advisory committee during this review period to provide updates and solicit feedback and recommendations for district initiatives, as well as learning and hearing firsthand about events and issues at school sites.

## **Policy**

During the 2018 review period, the district developed a process for updating its policies, which was carried forward into the 2019 review. During the 2021 review, the administration decided to take a more targeted approach and began updating policies as the need arose and CSBA updates were issued, which allows for a continuous update, although some were not revised when the update was available. Additionally, a Board Policy Committee has been established, and the district has created a review and development process that includes the distribution of updated and approved policies to all staff.

Notification of updates to the policies is communicated to all staff with a memo forwarded by email, more broadly disseminating new and amended policies and administrative regulations to keep all staff informed. The first memo noted policies and regulations approved at the November 2019 advisory board meeting and enclosed the revised documents as they were not yet available on GAMUT, the online board policy depository service provided through the CSBA. FCMAT was provided with subsequent memos illustrating this was not a one-time practice, but a protocol that is being established within the district's culture and practices. In addition, the district now can update GAMUT directly to ensure current information is available more quickly, though the website does not currently reflect the most up-to-date version of all revised and approved policies.



## **Board Roles/Boardsmanship**

The district advisory board continues to make progress. Members have received training on a wide variety of topics. Continued training and practice in procedures and norms will be beneficial as the advisory board works towards return of local control. All advisory board members, as well as the county administrator, have completed the CSBA Masters in Governance program, though FCMAT recommends that the district's training protocols include a requirement that advisory board members seek continuing education, or possibly renew their certification at either specified intervals or when major changes have occurred in the subjects covered by the program, to ensure they stay current. Interviews continue to affirm that advisory board member understanding of their roles and responsibilities increases each year, and their inclusion in all closed sessions, a practice of the county administrator, continues to provide them with additional practical experience.

Advisory board members attend board meetings and are provided with agendas and meeting materials beforehand although the timing for providing agendas in advance on Sundays could be improved to providing those materials on Friday, as was a practice in previous years. This would allow advisory board members sufficient time to review and prepare. Based on FCMAT's observation of the March 9, 2022, board meeting, and interviews with district administration, the advisory board members review meeting materials in advance and continue to meet with the county administrator and the executive team, as needed, before meetings to discuss questions and/or concerns. The relationship and trust between the advisory board, county administrator, and district staff has continued to improve and provides a stable foundation for the district and future transfer to local control.

The advisory board members maintain functional working relationships among themselves and have continued to work together to undertake initiatives (e.g., the Inglewood Educational Foundation, attendance at community events and meetings) that benefit the district and the community. The advisory board members as a whole and individually appear to know their roles and responsibilities and understand how they represent the community and not simply themselves. Although the newly appointed members are learning, they are taking their lead from the veteran members, which further illustrates the importance of training and modeling of behavior. They are all engaging with the community and provide input to the county administrator on matters of importance to the community and students. No incidents of potential Brown Act violations were noted during the current review period, and all advisory board members continue to submit their conflict of interest forms in accordance with Board Bylaw 9270. It is important that the advisory board members continue to develop habits and forms of communication that conform to the Brown Act, so there is no cause for concern once they resume local control.

## **Advisory Board Meetings**

Except for educational board workshops and special advisory board meetings, which are scheduled in advance, advisory board meetings are usually held consistently at 5 p.m. The advisory board calendar is posted online, which provides notice for staff and the public and ensures maximum community and staff participation. Due to the COVID-19 pandemic, the board meetings have been held virtually and livestreamed on YouTube Live Stream. They therefore continue to be made available in a medium that can be accessed from home. The advisory board continues to receive notice of the meetings as well as a copy of the agenda via email three days in advance, though typically on a Sunday, which may not allow sufficient time to



review the materials. While the county administrator has the authority to make final decisions for the district, the county administrator has continued the practice of providing the advisory board members with the opportunity to ask questions, express concerns, or share comments on items on the agenda, as well as attend and take part in closed sessions.

## **Personnel Management**

A district's HR Department plays an important role in students' academic and cocurricular success by providing an effective and efficient recruitment, selection, and orientation and induction program for all employees. In addition, personnel management plays a vital role in the district's fiscal recovery. With 85.70% of its unrestricted general fund expenses going toward employee compensation according to 2020-21 state-certified data (the last year for which state-certified data is available), the district's ability to regain fiscal solvency requires continued and sustained improvements in this area. The personnel management section of the comprehensive review assessed the district based on 28 priority standards in eight categories. The HR Department has continued to make progress with nine of 28, or 32% of standards fully implemented. Several of these nine standards are fully and sustainably implemented and have been sustained for more than a year. In 2021, 10, or 36%, of the standard scores declined. In 2022, only three of the standards, or 11%, fell into this category.

The July 2013 average scaled score for the subset of priority standards that the department's recovery plan is based on was 1.46. During the early years of recovery, the district struggled to implement many standards. By July 2017, all standards were at least partially implemented, and the average scaled score increased to 5.43. In July 2018, the average scaled score increased to 6.32. The July 2019 average scaled score rose to 6.60, indicating another year of growth as well as sustainability. The 2020 review was omitted by SB 98 due to the COVID-19 pandemic. The July 2021 average scaled score decreased slightly to 6.57, indicating that, despite the COVID-19 pandemic and a significant reorganization of the department, many standards continued to be sustainable. In 2022, the scaled score average rose slightly to 6.68 demonstrating sustainability of many standards, but with some standards showing no growth, and in a few cases, a decline.

## **Organization and Planning**

A few board policies and administrative regulations were updated to CSBA's template and adopted during board meetings for this review period. The district has continued sending a memo by email to all employees the day after the board meeting with all updated policies attached. A newly created position of director of employee relations and policy management (since January 2022), which is assigned to the HR Department, is the position responsible for monitoring and updating board policies.

The organizational structure, assignment of duties to positions within the department, and workload were of upmost concern at the time of FCMAT's fieldwork. For the second consecutive year, the department was restructured resulting in most employees being new in their roles. Additionally, several positions were vacant due to resignations and were not yet filled while others were designated temporary or interim, as in the case of the chief HR officer. A review of the department website's menu of services, updated job descriptions, and organizational charts provided to FCMAT failed to provide a clear picture of the work assigned to each position. In fact, these documents created significant confusion around roles and responsibilities and that confusion was shared by department staff and customers of HR. Confusion about roles and



responsibilities, the assignment of duties from the desks of vacant positions to others in the department already working at full capacity, uncertainty around the longevity of the interim chief HR officer, as well as pressures due to the responsibility for COVID-19 management, has left department staff feeling anxious, overworked, and overwhelmed.

### **Employee Recruitment/Selection**

Consistent with the prior review period, the Human Resources Division 2020-21 Annual Report was presented to the board during a regularly scheduled meeting held on November 3, 2021. The HR Department's goals were clearly stated during the presentation and were descriptive and narrowly focused on areas that will have a positive effect on all staff: recruitment, retention, position control, staff evaluations, and building professional capacity in HR staff through professional support and training. Department goals are specific and list intentional actions to reach department objectives. The items above reflect progress, however documentation reviewed by FCMAT did not indicate that there were department meetings or activities to help the department reach the goals described in the annual report.

The district continues to operate without a personnel commission; however, HR staff members have received training on the merit system rules, and there is strong evidence that the rules are being implemented. According to the district's recruitment budget, the district continues to renew its membership in the Personnel Commissioners Association of Southern California (PCASC) and its umbrella organization, the California School Personnel Commissioners Association. The district reports that review of the personnel commission rules is in process but did not designate a staff member who would be assigned this task, or an identified timeline as to when this work would begin. This task was in transition at the time of FCMAT fieldwork.

The department continues to implement and monitor the consistent application of written procedures on selection and hiring. The district continues to perform routine preemployment testing of classified employees as a part of the selection process. Onboarding procedures, including required trainings and notices, are implemented consistently. The HR Department provides hiring managers with individual support and training on the selection and hiring procedures and nondiscrimination in employment, which is a best practice. The hiring manager is largely responsible for the hiring process, including reference checks. Supervisors reported this is burdensome and impedes the district's ability to manage an efficient recruitment process.

The HR Department worked with the Business Services and Educational Services departments regarding enrollment and staffing needs for the 2021-22 school year. Interviews conducted during fieldwork indicate that the interim chief HR officer, CBO, and CAO met with principals in January to discuss staffing needs. Still, the hiring processes are noted as being slow, and critical staffing decisions were not being made within a timeline that supported a strategic recruitment response. The operational difficulties related to recruitment and selection practices continue to diminish the district's ability to hire fully qualified teachers. Classified staffing has also continued to be an issue with many vacancies in place due to the district's problems in attracting and identifying qualified candidates. The department has not established an effective response plan to the acute staffing shortages experienced by the district, and the operational recruitment procedures do not reflect the district's staffing needs. One of the major factors underlying this issue is the lack of competitive compensation for employees, which causes a significant recruitment issue. The district continues to use consultants and/or independent contractors to fulfill acute staffing demands. This is especially the case for management and special education



positions. The use of consultants is permitted for local educational agencies; however, the intent and purpose of the use of a consultant is to fulfill a short-term staffing need. Practices such as providing consultants with a district email and including them in its staff directory or organizational chart creates confusion regarding their role within the agency. Use of a temporary staffing solution on a long-term basis defeats the district's efforts to build internal capacity, and can have significant fiscal implications such as misclassification of a person as an independent contractor which can carry substantial monetary consequences to the district (e.g., payment of employment taxes, interest and penalties).

## **Induction and Professional Development**

The process the HR Department uses to provide new employees with all required notices and in-service trainings is systematic, monitored, and adjustments are made when necessary. Specifically, the HR Department continues to provide and document that all employees receive the annually required legal notices including, but not limited to, child abuse reporting, bloodborne pathogens, drug- and alcohol-free workplace, sexual harassment, diversity training, bullying, Integrated Pest Management Plan, safety, use of seclusion and restraint, youth suicide prevention, and nondiscrimination. Additionally, the district uses Keenan Safe Schools online training for mandatory new hire orientations, which includes understanding sexual harassment, bloodborne pathogens, preventing workplace violence, new employee training, and online mandated reporter training. These trainings occur prior to the first day of employment.

The HR Department continues to use standardized forms for complaints and for the Americans with Disabilities Act interactive process. The HR Department's handbook on its website includes information on the process for reporting or handling complaints concerning school employees. Information about uniform complaint procedures, including how to file a complaint, can be located on the HR Division page of the district website. However, no documents verified that the chief HR officer provided retraining annually to site administrators and department managers on responding to complaints and conducting preliminary investigations.

## **Operational Procedures**

The recent reorganization of the HR Department shifted leave tracking responsibilities to newly developed positions and new staff members within the department. This created training needs and additional staff support as newly hired HR employees acclimate to their job responsibilities. The absence tracking and reporting function continues to be an electronic process via the use of Airtable. Despite the department reorganization and reassignment of leave tracking and monitoring responsibilities, the systems and procedures implemented over the last few years have resulted in sustained improvements in this area.

At the time of the last review, the HR Department had undertaken a significant reorganization resulting in a need for all desk manuals to be updated. During the 2021 FCMAT visit, several employees in the department were in their positions for less than six months. Despite this significant change and the short tenure of staff hired into the newly reorganized positions, desk manuals were under development, were superior in content and organization than those developed in the past, and some were nearly completed. Again this year, the HR Department had undertaken a reorganization with nearly all employees in the department being new to their positions. Desk manuals were a primary source



of training as department staff settled into their roles. Desk manuals reside in Airtable, a cloud-based project management system, and are accessible to all department staff. Evidence suggests that Airtable is used extensively by the HR Department and is beginning to be used more by other departments.

HR, Business, Payroll, and Risk Management continue to hold regularly scheduled monthly meetings to coordinate employee issues, provide training, and prepare cross-departmental procedures and forms, which are stored in Airtable. For example, evidence provided to FCMAT included agendas from monthly meetings on leaves of absence, procedures related to working out-of-class, substitute timesheets, and training on integrating workers' compensation benefits with Education Code leaves. Staff members in these departments continue to report that the meetings are systemic and are essential in ensuring that employee situations are handled correctly. In between meetings, individual staff members report that they easily communicate with the other departments as situations arise. Evidence was provided for agenda items for discussion at the cross-departmental meetings, follow-up confirming decisions and remaining tasks from each meeting, and individual communications between meetings.

### **Use of Technology**

The district uses the LACOE software applications HRS for position control and HR functions and PeopleSoft for budget and business functions. Implementation of the BEST system, which will replace PeopleSoft, has been delayed. However, the HR Department has not allowed HRS's limitations, the application's position control shortcomings, or the delayed implementation of BEST to become an obstacle. The department uses Airtable to fill the information access gap. The district also uses Airtable for tracking employee absences, leaves, industrial injuries, and the return-to-work program.

The district is using Personnel Action Forms (PAFs) to approve positions and Position Control Forms for adding new positions, reinstating positions, replacing positions, or making changes to existing positions in hours or work year. The PAF and position control processes are duplicative in many ways and result in inefficiencies that delay the posting of vacancies and interfere with the timely filling of positions. HR is working to implement a process used by LACOE that will eliminate one of the forms and reduce the time between when a requisition is submitted and a vacant position is posted. The anticipated launch date is July 1, 2022.

### **Evaluation/Due Process Assistance**

The Education Code requires that all certificated employees with permanent status be evaluated at least every other year. Classified employees with permanent status must be evaluated annually. These Education Code requirements were not waived due to the COVID-19 pandemic. However, the district entered into memorandum of understanding (MOU) agreements with its represented certificated employees to suspend evaluations of permanent staff in the middle of the 2019-20 school year and to waive the evaluation requirements for permanent staff for the 2020-21 school year. Evaluations for classified employees were suspended for permanent staff for 2020-21.

The HR Department continued to provide supervisors with a list of all probationary employees under their supervision and the schedule for performing the evaluations required prior to the granting of permanency status to ensure that permanency status was not granted to certificated or classified employees not meeting standards or not demonstrating competency in their



assigned role. Evidence provided to FCMAT shows that certificated non-reelections and classified probationary releases have occurred during this review period.

The HR Department continued to provide extensive training to supervisors at the beginning of the 2021-22 school year, including training in effective evaluation techniques; however, it was a reduced version due to the impacts of COVID-19. Managers continue to consistently report receiving improved guidance and support in this area.

### **Employer/Employee Relations**

The ITA collective bargaining agreement was renegotiated in 2018 and expired at the end of the 2020-21 school year. The focus during the last reporting period was on memorandums of understanding related to implementation of distance learning during the COVID-19 pandemic. The district and ITA participated in IBB training and used the process during their 2021-22 negotiations. Principals were involved in bargaining district learning MOUs including updates to the articles on Leave, Grievance Procedure, Workday and Hours, Transfer and Reassignments, Organizational Security, Intermediate Discipline, Association Rights, Negotiation Procedures, and Term.

The CalPro collective bargaining agreement was renegotiated in 2018 and expired at the end of the 2020-21 school year. At the time of FCMAT's fieldwork, classified employees were no longer represented by CalPro, although subsequently, classified employees elected to be represented by California Teamsters Local 911.

### **Pupil Achievement**

For this progress report, FCMAT reviewed 31 standards in pupil achievement, with the ratings of 15 standards increasing, and 16 remaining the same. Overall, in the pupil achievement standards for the 2022 review period, the district's average scaled score increased from 3.87 at the last review to 4.48. The district's rating on many standards had been stagnant in the partially implemented category, which spans scaled scores of one through seven. The district has made many efforts to develop and plan around these standards and momentum is building. Staff is confident about the district's educational services team and coherence exists between components of the instructional plan. To advance scores on the rubric, the district must continue to focus on all elements of each standard being fully and effectively implemented, monitored and becoming systematic (scale score of six or above).

The district continues to implement and monitor the 2018-2023 Strategic Plan that district leadership, in collaboration with site administrators, staff, and community members developed, communicated and disseminated. The plan outlines five commitments: "The 2023 Commitments" that represent the district's promise to its students, parents, and community stakeholders. The plan also identifies four pillars, or capabilities that the district must develop to accomplish its strategies. Aligned under each of the pillars are key actions that were identified as priorities for ensuring the district meets its objectives. The district's Theory of Action Plan delineates how Pillar A: Teaching and Learning will be accomplished. The district's LCAP and SPSAs continue to be aligned to the 2023 Commitments and key actions of the Strategic Plan. For example, all SPSAs include the same instructional priorities: 1) close reading, 2) writing to demonstrate understanding and 3) engaging in academic conversations.



In collaboration with the LACOE and the CCEE, the district regularly monitors the actions of its Strategic Plan, and specifically, the three IUSD Instructional Performance Indicators for 2021-22, which include: 1) High School Graduation and College/Career Readiness, 2) K-12 Literacy, and 3) K-12 Special Education Programs. Instructional Performance Indicator 3 was updated during this review period to focus on increasing the percentage of students with disabilities (SWDs) participating in a general education setting for 80% or more of the day (80% of students, 80% of the day within the next three years). The IUSD Systemic Instructional Review (SIR) progress monitoring tool was developed by CCEE and LACOE and is used for quarterly reviews with the district. This tool was designed around the Strategic Plan and is aligned to the district's LCAP goals and FCMAT standards.

The district's LCAP, Strategic Plan, as well as the schools' SPSAs, delineate the issue of low student achievement throughout the district. Specifically, the district has high percentages of students not meeting grade-level standards and high school students failing one or more classes. The district has also noted that higher percentages of English language learners (ELLs) and SWDs are in these categories than are other student groups. The district's leadership has identified, and FCMAT has verified, several contributing factors, but primarily the lack of consistent, rigorous, effective first instruction is the greatest barrier to student success. In collaboration with LACOE and with CCEE support, the district is beginning to develop and monitor more systematic plans for instructional improvement as detailed in the Theory of Action Plan and the SIR progress monitoring tool. The district has continued to have transitions in key district and site leadership positions since the last review. The district held biweekly principal meetings, which included routine district business, but also consistently focused on collaboration, planning and professional learning intended to train principals to serve as instructional leaders. There were also several additional training opportunities outside the structured meeting time. Some of the topics for principal professional learning included the Cycle of Inquiry (CoI) implementation practices, MTSS including the identification of the core instructional program and designated grade-level interventions, the coaching of teachers, and digiCOACH classroom observation tool training with some calibration related to the walkthrough elements.

Evidence indicates the district-disseminated CoI data analysis template is used at school sites as part of the required CoIs. Documentation provided to FCMAT validated that grade level/content area data review meetings generally occur as required by the district. Samples of completed CoI forms from individual teachers and some grade level/content area teams demonstrate wide variability in how completely and effectively the CoI process is being implemented within and across grade levels, content areas, and school sites. The CoI process does not yet result in specific, measurable goals with instructional action plans to address the high percentage of students scoring below grade-level standard on district-required assessments.

The district returned to in-person attendance for the 2021-22 school year following 100% virtual instruction during the early part of the COVID-19 pandemic.

FCMAT visited classrooms at every school site throughout the district during this review period. School sites appeared clean, orderly and students were on-task. While on-task behavior was consistently observed, active engagement was inconsistent across the district. Consistent use of core adopted instructional materials was observed across the district. While there was evidence of implementation of the district's instructional priorities in the area of literacy observed in many classrooms, there was an absence of academic conversations across sites. Additionally, not all sites were implementing designated English Language Development (ELD). Improved coherence



across the district in terms of common language and references to the district instructional priorities by principals was observed. There was wide variability in implementation of close reading and writing across the curriculum between sites. Many teachers were observed posing and answering questions themselves instead of allowing students to respond, and most questions were at Webb's Depth of Knowledge level 1 or 2 where students were not challenged to use strategic or extended thinking.

Documentation provided, as well as interviews with site and district administrators, indicated that evaluation of instruction to improve teaching and learning was not systematically implemented or monitored during 2021-22. Principals were expected to conduct classroom visits three times per week and provide feedback to teachers. In fall 2021, the district reintroduced the digiCOACH tool to enable administrators to collect data on classroom observations.

Each school site is required to use the online student study team (SST) system for managing referrals and progress of struggling students, although interviews indicated that not all use the online software, and implementation of the SST process and tool is inconsistent across the district. i-Ready continues to be used as a universal screening and progress monitoring tool across grades TK-8. For grades 7-12, Achieve 3000 has been required to be administered three times a year, although sites vary in how they use the results. The online SST system requires recording of interventions used with a student, but because of inconsistencies in the type of interventions offered at various school sites, significant numbers of underachieving students are still referred to special education with little to no documented interventions.

Even though an MTSS map for academic and behavior interventions was developed and disseminated to district staff in 2017-18, the district remains in the process of developing a coherent MTSS for all students in need across the district. While Tier 1 and 2 interventions have been outlined, further development of Tier 2 is needed to define options for students who are not responding to initial interventions. Additionally, Tier 3 needs to be developed, and the district must adopt a reading intervention for students in grades 4-8 who are two or more years behind.

The district has a defined assessment system. Community partners were included in the assessment system development, and the revised system reflects community partners input and feedback. The assessment calendar continues to require the use of technology-based i-Ready assessments, interim assessment block (IABs) and the interim comprehensive assessments (ICAs) from the 2018-19 California Assessment of Student Performance and Progress (CAASPP) System, California required CAASPP summative assessments, English Language Proficiency Assessments for California (ELPAC), Dynamic Indicators of Basic Early Literacy Skills (DIBELS), Achieve 3000 and assessments from the district-adopted instructional materials. Completion rates for defined assessments across the district vary. Use of instructionally embedded formative assessment in classrooms varies widely.

There was evidence of the review of assessment data at the district level on a regular basis, but there continues to be minimal evidence that the wide variety of data generated from the common assessments is systematically used for assessing program effectiveness and guiding curricular decision-making at the site level. The high school level lacks a specific system for data collection and analysis across departments and disciplines. This results in data not being utilized to inform decision-making and professional development across all disciplines.

Interviews indicate the district continues to make a concerted effort to ensure that all core classes and electives meet A-G requirements. Ed-Data reports the percentage of cohort graduates



meeting UC/CSU course requirements increased from 52.4% in 2019-20 to 62.2% in 2020-21. This is an increase of 26.2% since 2016-17 when rates were 36%. However, disproportionality exists in the district's percentage of cohort graduates meeting UC/CSU course requirements by race/ethnicity and gender, and certain groups are less likely to meet UC/CSU course requirements including SWDs and ELLs who had 33.3% and 45.3% of students meeting UC/CSU course requirements, respectively, in 2020-21.

The college and career readiness performance indicator, as reported on the California School Dashboard (Dashboard), measures how well a district or school is preparing students for success after high school. In 2018-19, the last year college and career readiness was reported on the Dashboard, the district was given an overall yellow performance status of 18.9% of students being prepared. In 2020-21, the last year graduation rate data was available through Ed-Data, the district experienced a slight decrease to 86.2% in the cohort graduation rate, down from 87.2% in 2019-20 and 88.5% in 2018-19. Disproportionality exists in the district's graduation rates by race/ethnicity and gender, and certain groups are less likely to graduate including SWDs and ELLs who had a 70.1% and 78.5% graduation rate, respectively, in 2020-21.

In 2018-19, the last year advanced placement (AP) data was available through Ed-Data, there were less students taking AP exams over the prior review period, with individual sites ranging from 13.9% to 18.3%. The data showed a higher percentage of district students receiving a score of 3, 4 or 5 from 21.8% in the prior review period to 28.3% in 2018-19.

District leadership continues to identify least restrictive environment (LRE) as an area needing constant communication of expectations and building capacity of site leadership and instructional staff to make appropriate placement decisions during individualized education program (IEP) meetings. The district is targeting LRE as Instructional Performance Indicator 3.

Interviews and information reviewed indicate some progress is being made in this area, which requires that programs for special education students meet the LRE provision of the law and the quality criteria and goals established by the CDE and the Individuals with Disabilities Education Act (IDEA). In January 2022, the special education staff and administrators received initial training on Chapter 5 of the Southwest Special Education Local Plan Area (SELPA) Policy and Procedures Manual (PPM), which addresses LRE. At the time of FCMAT's visit, the district was finalizing an LRE instructional memo to clearly outline LRE expectations for site teams. Additionally, the district opened a new classroom focused on therapeutic behavior support for SWDs at Morningside High in January 2022. The intent is to use this placement option to keep SWDs in a program on a comprehensive district campus instead of a separate school setting such as a nonpublic school.

The district employs instructional coaches that have both elementary and secondary levels of experience. Coaches serve specifically at school sites, easily providing direct service to classroom teachers. In past years, instructional coaches provided professional development regarding specific curriculum use and instructional strategies at school sites based on site leadership requests and sometimes based on assessment results. During this review period, instructional coaches at many sites were being used as long-term and short-term substitute teachers due to staffing shortages and were unable to function as they had in the past.

The district's professional development plan is coherent and connected to the instructional priorities. The district contracted with the New Leaders organization to provide leadership training and mentoring to principals and the Educational Services leadership. The district



indicated that the primary goal for its contract with New Leaders is to strengthen the effectiveness of instructional leadership at all schools to fully implement the district's MTSS Plan. New Leaders was reported to be positively received and appears to benefit coherence of district and site leadership. Professional learning for teachers needs to move beyond workshops to classroom-embedded learning experiences.

## **Financial Management**

The financial management section of this comprehensive report assessed the district based on 43 FCMAT standards. The district received an average rating of 4.26, an increase from the score of 3.70 achieved in the prior review period. Two standards received a zero score-not implemented; 35 standards received scores between one and seven-partially implemented; and six standards received scores between eight and 10-fully implemented.

The CBO was hired in September 2020 and oversees the Fiscal Services, Facilities, and Food Services departments. During this review period, the former IT Department was split into two departments: IT and Educational Technology. The new IT Department and the Maintenance, Operations and Transportation Department are now overseen by the CBO. At the time of FCMAT's fieldwork, the department head of one of the departments was vacant, one was recently promoted to the position, one had been with the district approximately five months, and two had been with the district for slightly more than a year. The business office continues to experience staff turnover in several positions, and at the time of fieldwork, none of the business office positions were vacant but nine of the 16 were filled and/or refilled during this review period. The ongoing restructuring of the Business Services Department and continual turnover of business office staff has made it extremely difficult for the district to make progress in improving operational processes and procedures. FCMAT continues to recommend that business office staffing be reviewed to ensure staff have the necessary skills, are properly trained and held accountable to perform essential functions. However, the CBO is in meetings most of each day, which makes it difficult to complete necessary business functions, to build staff capacity, and for people to access him when needed.

Business office and/or school site and department administration and support staff continue to need initial or additional training in numerous areas such as the financial system, budget, student information system (SIS), associated student body (ASB), purchasing and payroll, as applicable to their job duties. Although there have been some issues due to the pandemic and numerous new employees, interviews indicated that communication within the business office and between the business office and other departments and school sites has continued and that the business office has generally been responsive to requests for information. However, communications between the Business Services and HR departments have sometimes been lacking during this review period.

## **Budget and Multiyear Financial Projections**

The district adopted its 2021-22 budget within the statutory timelines and conducted public hearings for its 2021-22 LCAP and proposed budget as required. The county office of education approved the budget. The district filed its 2020-21 second interim and 2021-22 first interim budget reports within statutory timelines; both reports were certified as positive.

The LCAP must be aligned with the budget and MYFPs. The LCAP lists the district's goals and actions to achieve those goals and should be an integral component of the budget. Interviews



indicated that the budget and LCAP are aligned, the criteria and standards forms for the 2021-22 adopted budget indicate that the budget includes the expenditures necessary to implement the plan, and the county office approved the district's LCAP. However, the 2021-22 budget and first interim assumptions narrative documents and PowerPoint presentations do not include discussion of the plan, which makes it difficult for readers to easily discern the extent of its alignment with the budget at each reporting period.

Although the district's 2021-22 adopted budget projected deficit spending in both subsequent fiscal years, these were significantly reduced at first interim due to a combination of one-time COVID-19 revenues and the ADA hold harmless provisions. The district's 2021-22 first interim report does not project deficit spending in the general fund in fiscal years 2021-22 or 2022-23, but it does project deficit spending of \$961,300 in 2023-24. Reserves for economic uncertainties were projected to be 3.05% for 2021-22, 3.01% for 2022-23, and 3.07% for 2023-24. The district also included an assigned amount of \$35.21 million, \$36.25 million and \$35.17 million, respectively, in each fiscal year of the projection as part of the components of ending fund balance. The total available reserves with the designated assignments for the unrestricted general fund are 22.94% in 2021-22, 29.08% in 2022-23, and 29.57% in 2023-24. The district is projecting to deficit spend in the unrestricted general fund \$1.18 million in fiscal year 2023-24, which could severely affect its recovery plan and long-term fiscal solvency.

The district's 2021-22 first interim report submitted to the county superintendent included an updated FSP reflecting expenditure reductions and revenue enhancements. The FSP is a multiyear strategic blueprint critical to the district's ability to regain fiscal solvency. The FSP projects a reduction to the routine restricted maintenance account (RRMA) in both fiscal years 2022-23 and 2023-24; however, the district would likely not meet the required minimum contribution with the estimated reductions. The county office noted concerns with the district's declining enrollment and its impact on revenues. In addition, the county office recommended that the district continue to assess and adjust staffing needs and facility planning based on the projected rate of decline in its enrollment. The district will need to continue efforts to achieve and maintain a balanced budget, eliminate the projected structural deficit in its unrestricted general fund, and maintain a positive cash balance.

During the prior review period, the CBO began conducting monthly meetings with each site principal to discuss their budgets, staffing and other school site responsibilities. These meetings continued during this review period and included staff from the Business Services and Educational Services departments based on the topics being discussed. The business office revised the Budget Development Process for School Sites and Department manual that provided some information to administrators about budget development, and the business office provided school sites with budget development worksheets. The budget development manual and budget allocations were reviewed with principals, and the budget worksheets were to be completed and returned to the business office. The district should also develop and implement standardized budget worksheets for department budget allocations.

Although the district has implemented best practices for some critical functions that include some basic budgeting processes, it has not implemented proper budget monitoring or proper alignment of budget to actual expenditures.

The district has worked continually to implement processes and procedures and ensure both Business Services, including payroll, and HR departments' staff have been trained correctly on



position control. The Business Services and HR staff are meeting monthly to review and reconcile position control; however, the actual payroll and position control are still not being reconciled. The way that the district accounts for overtime, extra-duty pay, stipends and substitutes show these types of positions as vacant in the position control system. This method is not conducive to determining actual vacancies. In addition, savings for unfilled positions should be recognized throughout the year to provide a realistic budget projection and financial position.

## **Audit and Internal Control**

The development and implementation of a system of internal control that includes written operational procedures, proper segregation of duties and other control activities designed to safeguard district assets and to detect and deter fraud is essential. Processes and procedures for routine business activities are the foundation of strong internal control, and implementation, routine monitoring and enforcement are essential to their effectiveness. The district continues to work on improving processes and procedures supporting its system of internal control, but struggles in some key areas.

The district has improved its board policy review and update practices but continues to struggle with the alignment of the appendix listed in Board Bylaw 270-Conflict of Interest with its organizational structure. Additionally, the district continues to struggle with resolving incongruencies between the most current version of this bylaw and exhibit and that which is accessible to the public from the district's website.

The district continues to experience a decline in the number of audit findings since the 2016-17 audit, which contained 41 findings. The 2020-21 audit contained eight findings, five of which were repeated or partially repeated from the prior fiscal year. One of the three new audit findings presented indicates a weakness in internal controls that limits access to information databases maintained by the district. The district should ensure that all audit findings are reviewed with applicable staff, and that best practices and recommendations are implemented timely.

The district has assigned responsibility for internal audit to the director of fiscal services position. At the time of FCMAT's fieldwork, this individual has had little time to implement a structured internal audit process. The district does not have an audit committee, nor does it have a fraud prevention program.

The district has various procedure manuals for accounting, payroll and purchasing as well as some separate written procedures that are not included in these manuals. Some staff have resumed efforts to establish and update operational processes and procedures for the Business Services Department. However, there is no established process or timeline for reviewing and updating procedures as changes within the department take place. All processes and procedures documents and manuals should be reviewed and updated at least annually and should be posted in a centralized online source, such as Airtable.

Interviews with staff indicated that while board policy, administrative regulations and operational procedures may be established, there are problems in the consistent application of operational procedures. Interviews with staff indicate issues in holding school site and department administrators accountable to established procedures as executive management overrides the established procedures at their discretion. Management override of formally established policies and procedures weakens the district's system of internal control and increases the risk of misappropriation of funds.



## **Student Attendance and Associated Student Body**

The district has gained stability in established processes for properly collecting, recording, maintaining and reporting enrollment and attendance in a consistent manner districtwide. Student enrollment and attendance is under the leadership of the COO, who is supported by the director of student support services. The director of student support services position was vacant at the time of FCMAT's fieldwork. The district has established a team that is responsible for implementing strategies that ensure student data is appropriately reconciled and reported through California Longitudinal Pupil Achievement Data System (CALPADS). However, due to continued turnover and/or restructuring of positions the district continues to struggle in achieving a collaborative process that ensures all aspects of student enrollment, attendance, and CALPADS reporting requirements are seamless.

The district has improved some of its processes for identifying students attending and exiting nonpublic schools (NPSs); however, current processes do not ensure that enrollment and attendance are captured and reported to the state for all students attending nonpublic schools. Interviews indicate that staff continue to note students listed on NPS invoices that are not enrolled in the SIS and vice-versa. Attendance for students presented in invoices but not listed in the SIS is not included in the totals reported to the state.

Because the SIS information drives the data submitted through the CALPADS reporting process, and is critical to both the level of state funding provided through the LCFF and student testing, having accurate student data entered in the SIS in a timely manner is imperative. The information should be routinely reconciled with CALPADS and other ancillary systems, including those for child nutrition. It is also essential to ensure that all required supporting documents agree with reports submitted to the state, and that the documents are retained in a centralized location for audit.

The district adopted BP 3452-Student Activity Funds, in February 2019, but it is unclear if the district communicated with the school sites regarding the specifics of this policy. The district continues to lack standardized procedures on how ASB organizations are to operate and to ensure adequate internal controls are implemented. Some school sites use FCMAT's Associated Student Body Accounting Manual, Fraud Prevention Guide and Desk Reference; however, the district has not implemented previous recommendations to provide written internal procedures for ASB that provide direction to staff, ensure effective administrative oversight, and clearly define the roles and responsibilities of all personnel involved in managing ASB funds. The lack of internal control and oversight at the school sites and the district office could lead to misappropriation of ASB funds.

In August 2021, the district hired a director of fiscal services who was recently assigned to oversee ASB. During this review period, the district implemented the ASBWorks accounting software at its high schools. At the time of FCMAT's fieldwork, the district was also in the process of centralizing the middle schools' ASB deposit and payment functions at the district office and consolidating the middle schools' ASB bank accounts. The district should provide initial and annual training to all employees who are responsible for ASB functions, and it should make the training mandatory for all applicable employees and administrators.

## **Other Related Areas**

**Management Information Systems** – The district created a District Technology Advisory Committee (DTAC) several years ago to guide the district in its use and selection of technology. The DTAC meetings had been led by the executive director of IT and committee members



included lead technology teachers, principals, cabinet members, department leads, and senior IT staff. When the IT Department was originally transferred from the Business Services Department to the Educational Services Department in March 2020, the DTAC meetings ceased and were replaced by new Instructional Technology Committee (ITC) meetings that have a strong instructional emphasis and departments outside of Educational Services no longer participate. With the loss of the DTAC, the district has lost wide-ranging discussions with an emphasis on districtwide, two-way communications between departments. The DTAC meetings should be reinstated along with the ITC meetings.

Although work has begun on documenting equipment to be included in a replacement plan, the district lacks a formalized lifecycle replacement plan and annual budget for critical network infrastructure equipment. This lack of planning will create unplanned expenses and outages when systems cease to function. The district has not implemented previous recommendations to create a formalized lifecycle replacement plan and annual budget for all its technology equipment.

Inventory – The district previously contracted with a vendor to perform a physical inventory of items with an original cost of \$500 or more, and a fixed asset report dated June 30, 2015 was completed. No person or department has been responsible for maintaining all the records, including asset acquisitions and disposals, since the 2015 physical inventory was completed. Staff interviews indicated that all fixed assets are not routinely tagged, and that some items are missing from the inventory. Findings included in the last several audit reports include material weaknesses specifically related to inventory and fixed assets and contributed to the qualified opinion given by the external auditor in the 2020-21 audit. In February 2021, the district approved an agreement with another vendor to perform a capital asset inventory, which was completed in June 2021; however, additions and disposals are still not tracked. The district should establish procedures that require all equipment and other fixed assets valued at \$500 or more to be properly tagged for inventory purposes. The employee assigned to maintain the fixed asset inventory system, and all employees involved in the asset identification, tagging and reporting process should be properly trained and cross-trained. The district should consider completing an annual inventory until roles and responsibilities are assigned and inventory procedures are properly implemented.

The district surplus inventory and salvage procedures do not support appropriate reporting requirements, which necessitate inventory to be tracked as to the time and mode of disposal. The procedures do not provide for proper internal control, possibly allowing valuable items to be disposed of without proper review. Procedures should be updated and/or developed and implemented to ensure proper processes are followed, and all applicable employees should be trained in their use and held accountable for following them. The processing and disposal of surplus assets and instructional materials should be centralized to eliminate the opportunity for loss or theft, and all vehicle pink slips should be secured at the district office.

Food Service – The 2020-21 unaudited actuals show that the cafeteria ending fund balance has decreased to approximately \$1.8 million. The district has continued to make purchases to align with its three-year spend-down plan, and correspondence from the CDE indicated that the spend-down agreement was extended through the 2021-22 school year. The district should monitor its cafeteria fund spend-down plan to ensure that the expenses are not ongoing and do not create an operating deficit that requires a contribution from the unrestricted general fund in future years.



During the prior review period, the district was restructuring the Food Services Department. In August 2021, the district hired a director of fiscal services whose duties include oversight of food service, along with the two food service operations managers. The district should ensure that all staff who are assigned to oversee and operate the program are adequately trained and supervised, are knowledgeable about program requirements, and properly analyze the financial aspects of the food service program monthly to evaluate profitability and identify any areas of concern.

Special Education – The 2020-21 unaudited actuals show an unrestricted general fund contribution of \$22.8 million, or 76.73% of total special education expenditures. The 2019-20 unaudited actuals contribution was \$25.2 million, or 79.16%. The statewide average unrestricted general fund contribution to special education was 67.17% for 2019-20 and 64.44% for 2020-21.

Effective with the 2017-18 school year, the Southwest SELPA transferred administrative and program responsibilities from LACOE to Lawndale Elementary School District. The Southwest SELPA is responsible for the supervision of all special education programs and coordination of regionalized services between member districts. As part of the program takeback, the member districts voted to partially support the regionalized services costs for three years with a SELPA subsidy, decreasing the amount the district pays for regionalized services. However, the subsidy was reduced in 2020-21 and will be eliminated in 2021-22. The district's 2021-22 costs for regionalized services are estimated to be \$1.88 million, which includes a reduction of \$614,115 for various revenue offsets. The district still contracts with outside agencies for all speech-related services including assessment, progress monitoring and IEP participation; however, now the district meets monthly with the agencies. Additionally, a district program specialist participates in all IEPs, so agencies are not exclusively managing these services provided to students. As mentioned in previous reports, it can create a conflict of interest and it is not a best practice to use an outside agency to assess students, determine the level of service they need and provide services.

In prior review periods, the district was not tracking costs related to students who were attending nonpublic school/licensed children's institutions (NPS/LCI) and any that might have been eligible for reimbursement of costs exceeding the annual threshold amount. In the current review period, the district submitted eight claims for reimbursement; however, FCMAT was unable to verify the validity of the claims due to a lack of supporting documentation. Clear communication between the Special Education and Business Services departments regarding the criteria for qualifying students, roles, relationships and responsibilities should be established so that the district uses all opportunities to generate income. Additionally, the district should formalize all new processes and procedures in writing to ensure continuity should there be a turnover in staff. The district continues to take steps to increase communication between the Business Services and the Special Education departments. Administrators from both departments are now meeting weekly to review and discuss the SELPA's excess costs billings and budget. However, more communication is necessary and should expand to include topics such as: budget development and monitoring, maintenance-of-effort requirements, staffing, student counts, and program needs. To provide for consistent data districtwide, the HR Department should be included when meeting topics involve staffing issues.



Communication between the SELPA and the district is critical to proper receipt, budgeting and monitoring of special education income and expenses. As the voting member representative for the district, it is important that the county administrator continue to attend all SELPA superintendents' meetings, and the CBO/designee should continue to attend SELPA business meetings.

Interviews indicated that the district is considering another reorganization of the Special Education Department, with the addition of several central office and program specialist positions. Given the continued increased cost of the district's special education programs, the district should continue to work with the county office and rely on assistance from the CCEE before increasing ongoing expenditures. Before restructuring the Special Education Department, the district should compare the department's organizational structure and staffing to that of several districts of similar size and student demographics. Changes that would further increase ongoing expenditures should be avoided.

Transportation – The Annual Report of Pupil Transportation previously filed with the state is no longer required. In the absence of the report, applicable district departments should mutually determine the management data and information necessary to properly manage transportation expenses. To track and control costs, expenses need to be budgeted and charged to the proper accounts throughout the year to provide opportunities for variance analysis. In addition, the Transportation Department manager should have access to the budget and routinely monitor it. Per the 2020-21 unaudited actuals, the district spent approximately \$1.8 million on transportation, and its entitlement was \$962,143.

The district typically provides most of its own special education student transportation; however, due to a lack of capacity, some students are transported by LACOE. In an effort to contain costs, the district should evaluate the cost of transportation provided by the county office to determine whether the district can transport these students more cost effectively. Invoices from all outside providers should be reviewed, reconciled with student data and approved prior to payment. Detailed information should also be obtained from fuel vendors and be regularly reviewed and analyzed, any anomalies should be investigated.

Agreements with transportation contractors should be approved prior to commencement of services, and the district should ensure that it complies with Education Code 39802 when awarding transportation contracts. The deputy chief maintenance and operations officer should be a resource in determining the most cost-effective means of transportation; budget accuracy may be improved if all transportation contracts were managed by the Transportation Department.

As part of a 2013-14 recovery plan, the district intended to reduce the assignment of eight-hour drivers. However, since the prior review period, work hours for several drivers have been increased. Based on the district's historical and projected structural budget deficit and reduced student transportation services in 2020-21, it is unclear why the hours were increased.

Risk Management – The district continues to comply with Governmental Accounting Standards Board (GASB) 75, which requires the district to have an actuarial report for other post-employment benefits (OPEB) every two years. Based on the actuarial projection and pay-as-you-go method of payment, the district's OPEB payment will increase each fiscal year and reach a cost of almost \$1.1 million in 2027-28.



## **Facilities Management**

During the 2022 review, the facilities team assessed 31 standards in 10 categories. FCMAT visited sites including TK-12 schools, district-operated charter schools, the adult school, continuation school, district warehouse/maintenance yard and transportation on February 28 through March 2, 2022. FCMAT also interviewed selected district staff via Zoom or in person during site visits, which included district administrative, site administrators, maintenance, operations, and custodial personnel, and members of the facilities and bond oversight committees. In addition, the team requested and reviewed documentation to verify and support the facility standards.

Of the 31 facilities management standards reviewed, scores for 18 standards remained the same, improvement was found in 12 standards and decline was identified in one standard. Overall, the average rating increased from 4.71 in 2021 to 5.16 in 2022.

In the past year, the district hired a deputy chief maintenance and operations officer, who began in December 2020 in an interim capacity. This staff member came out of retirement to take on this leadership position. The district's hiring of an experienced and knowledgeable person into this position is beginning to result in progress and improvement in the operational areas he oversees. Stability in this and other management positions is vital to the progress of the district. With frequent turnover of staff in the past, the district's historical knowledge was lost and progress toward goals stifled.

The district operates 19 schools and was unified in the early 1950s. Many school facilities were originally constructed within the first two decades of its unification. The communities served by Inglewood Unified have shown consistent support for facilities funding. In 1998, the district passed Measure K, providing \$131 million in general obligation (GO) bond funds. Another bond, Measure GG, was passed in November 2012, resulting in an additional \$90 million in GO bonds. In 2020, yet another GO bond, Measure I, was passed authorizing \$240 million in funding to support facility improvements, repairs and construction.

## **School Safety**

FCMAT found that all school sites in the district have developed and approved their Comprehensive School Safety plans in alignment with BP 0450 and California Education Code Sections 32280-32289.5, which requires site specific considerations. A copy of the district's Comprehensive School Safety Plan was prepared and supplied to sites and posted on the district website. The district incorporated additional policies, protocols and procedures into the district and site plans to include pandemic safety guidelines. Most school safety plans indicated schedules for earthquake and fires drills and almost all conducted the drills in accordance with board policy.

The district's safety committee has not met since February 2021. However, the recently hired interim police chief has taken a role in school site safety planning including conducting districtwide safety surveys, meeting with site administrators, and updating the Comprehensive School Safety plans.

All site principals reported that fire alarm systems operate correctly except for Payne Elementary, which required alarms to be pulled at two locations to alert the campus. Worthington Elementary has only one pull station located in the school office, raising concern about whether the alarm could be triggered in a timely manner, if at all, in an evacuation. Public address systems at Highland Elementary and Inglewood High schools remain incapable of addressing the entire site.



All district school and work sites had safety data sheet (SDS) binders listing the current cleaning products used and the safety information on their handling and use. All were recently updated apart from Inglewood High School. There is no evidence that training on SDS occurred since the last review. In addition, the district's Hazard Communications Program developed in 2019 to provide for the identification and safe use of hazardous materials appears to no longer be in use.

The district updated its IIPP since the last review and held a districtwide professional learning day in which safety training and some areas of the IIPP were covered. The district also offers online IIPP training and maintains a record of all annual training.

The district continues its struggle with key standardization. The district has not fully implemented a standardized lock system, and as a result, many staff must carry many keys. At times during FCMAT's visit, staff including administration, maintenance and operations and custodial staff could not open areas as they did not have the appropriate key. However, key controls are in place. The district has a standard key authorization form and process for issuing keys that controls distribution, and all keys are issued from the central operations office. The site principal or administrator is responsible for the issuance, security, and return of all keys to the site under their supervision. All keys assigned to teaching and classified staff are relinquished to the principal on the last day of school, and no keys are authorized to be maintained by staff members on summer break.

The district does not have a board policy or district standard specifically addressing outside lighting. In addition, assessment of exterior lighting is not part of any district inspection process or reporting. However, evidence of repair and improvement of outside lighting was found in the work order system and during site visits. All sites had exterior lighting that appeared operational, and no complaints or concerns were noted during this review period.

## **Facility Planning**

The district's BP 7110-Facilities Master Plan was last revised in February 2019 stating, in part, that to solicit broad input into the planning process a district advisory committee may be established. The committee is to serve in an advisory capacity to the county administrator and is to be composed of one member from each of the following groups: student, parent, classified staff, teacher, facilities representative, fiscal representative, education administrator, community member, city government representative and a businessperson. The committee was originally established and functioning under the prior policy but has not met since January 2018.

The district's facilities capacity continues to be roughly twice the amount needed to house its student enrollment. Over the last few years, the district has made some progress to adjust facility use to match enrollment with the removal or demolition of excess portable classrooms and consolidation of two school sites.

In March 2021, the district issued a request for statement of qualifications (RFQ) to select its architectural and engineering service providers. This RFQ was updated to meet new industry and district specifications. In addition, the district has engaged a consultant to develop a new 2022 Facilities Master Plan to replace and update the previous draft plan developed in November 2018 which was never adopted. The last adopted Facilities Master Plan was in 2015. Based on the information provided, the plan under development will include information from a demographic study completed in January 2022 and expected future projects and funding. The district's past



turnover of staff has created issues regarding a loss of project knowledge, continuity, and direction. The creation of a new, multiyear plan is a major step toward improving this situation by documenting the planning of projects into the future in alignment with the district's vision and needs.

During interviews with district administration, discussion included previous FCMAT reports and the district's present project status. The district's needs assessment and facilities plans are being updated to include status of projects, prioritization of projects, future projects and utilization of the various funding sources available including the newly passed GO bond, Measure I.

### **Facilities Improvement and Modernization**

Measure I, passed in 2020, authorized \$240 million in bonds. The language for this measure states it is for Inglewood Unified School District Student Safety/Health/Achievement, Classroom Repair Measure to repair/upgrade classrooms, including instructional technology, vocational/career education, roofs, plumbing, security/fire safety; remove asbestos, lead paint, mold; provide safe drinking water; and acquire, construct, repair sites, facilities, equipment. The district has previously applied for and was approved for \$44 million in LAWA funding and utilized those funds. The district believes that additional projects may be eligible to receive LAWA funds and continues appeals to LAWA for reconsideration. These funds should be used to complement any available local or state facilities funds.

During this review period, the district has made progress on projects. The Woodworth-Monroe merger was completed, upgrades at Morningside High have progressed, and renovation of Oak Street Elementary nears completion. In addition, many smaller projects throughout the district have been undertaken including improvements on shade structures, playground equipment and blacktop surfaces.

The district has found it difficult to navigate the state's funding process for facility modernization and new construction while managing the requirements of the CDE, Office of Public School Construction (OPSC), Division of the State Architect (DSA), and LAWA. The district did not provide evidence of its modernization eligibility and does not have plans to apply for modernization or Career Technical Education (CTE) facilities funding. A statewide bond election is under consideration for the 2022 fall ballot. The district should establish its eligibility for modernization and CTE, then apply to get on the list for state funding when it becomes available. In the short term the district can rely on outside consulting for establishing eligibility and submitting applications to the OPSC and DSA, but should work to develop its internal capacity.

The district should continue efforts to maintain project records and drawings to assist with facility maintenance and future planning and projects.

### **Facilities Maintenance and Operations**

The district's 2021-22 first interim RRMA budget is \$5,061,569, which exceeds the requirement under EC 17070.75. The district did not expend all its 2020-21 RRMA funds, and at the time of FCMAT's fieldwork, was on pace to not expend all its budget for 2021-22.

For previous reviews, the district provided FCMAT with a multiyear plan for preventive and deferred maintenance work, with 2021-22 being the last year in the plan. For this review, no documents provided support a multiyear preventive and deferred maintenance list. The district does not use its work order system to proactively schedule preventive maintenance work such as inspections and servicing of heating, ventilation and air conditioning (HVAC), roofing, fire



alarms, etc. Sites reported that most work orders are responded to in a timely manner; however, most maintenance activities are reactionary rather than preventive.

LACOE conducted seven of the eight facilities inspections required under the Williams Act. Two inspections received exemplary ratings and the other five received overall ratings of good. The district performed preinspections on the sites to be inspected by LACOE but did not conduct facilities inspections of schools not visited by LACOE.

BP and AR 3511 promote the use of a resource management program that should include tracking utility costs and consumption. The district does not maintain a position or system to track utility costs or energy consumption. Interviews indicated there are currently no reviews of energy consumption. In addition, the district does not utilize an energy management system (EMS) although it had a limited computerized system in the past. However, in its facilities planning, the district includes energy efficient upgrades, and Measure I language included a goal and purpose to upgrade facilities for energy efficiency.

The district continues to keep adequate maintenance records and has inventoried all the tools, materials, supplies and equipment that are stored at the maintenance and operations/central warehouse facility. Unused or unnecessary tools and equipment are discarded. While the district did not provide FCMAT evidence of periodic inventory counts to verify its accuracy, the warehouse appeared mostly organized with few tools stored out of place. Employees who are required to perform custodial, maintenance, or groundskeeping work are generally provided with adequate supplies and equipment to perform their tasks.

The district has procedures for evaluating the quality of work performed by the maintenance and operations staff; however, at the time of the FCMAT review, evaluations for all maintenance, custodial, groundskeeping and transportation staff members had not been completed for 2020-21 or 2021-22. Accountability is an issue in several places and should be a priority moving forward. For example: the custodial practices of checking and cleaning restrooms periodically are not done with fidelity throughout the district; and the groundskeeping crew was not found to follow a schedule with consistency.

### **Instructional Program Issues**

Education Code 35293 requires districts to develop and maintain a plan to ensure equality and equity of all its school site facilities. The district's BP 7110, last revised in February 2019, states that one component of the Facilities Master Plan should be the "Analysis of the safety, adequacy, and equity of existing facilities and potential for expansion, including the adequacy of classrooms, school cafeterias and food preparation areas, physical activity areas, playgrounds, parking areas, and other school grounds." The draft plan does not include all these components, but the new facilities plan being completed is expected to contain these considerations.

The district has implemented a team approach to groundskeeping duties in which teams visit sites routinely to maintain the grounds, landscaping, and gardening. Site principals interviewed by FCMAT indicated varied satisfaction with the landscaping conditions at their sites and many believe that the groundskeeping staff is inadequate to maintain the current facilities at an appropriate level of care. A lack of clear roles and conflicting responsibility was evident between the district landscaping/groundskeeping crew and site staff.



The landscaping condition at the sites visited by FCMAT in this review showed a reduction in underwatered areas as more focus has been given to correcting irrigation issues. This may, however, require increased mowing frequency for existing staff. A groundskeeping handbook that had been drafted and provided in prior reviews, has not yet been finalized and implemented. Having a handbook would help to establish acceptable conditions and procedures, determine staffing needs, facilitate training and assist with accountability of staff.



# **Community Relations and Governance**







## 1.1 Communications

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### Professional Standard

The LEA has developed a comprehensive plan for internal and external communications, including media relations.

### Findings

1. Board Policy (BP 1100-Communication with the Public), updated April 2019, directs the superintendent or designee to develop a communications plan for the district. (There is also a board policy regarding media relations-BP 1112, although it has not been updated since January 2013.)
2. During the 2017 review, the former state administrator approved the Communications Plan 2017-2020 dated February 8, 2017, with a supplemental implementation plan that provided specific actions and tasks, identified the parties responsible for completion of the actions/tasks, noted the timing for their completion, and established measurable outcomes for each one.
3. During the 2018 review, a Communications Steering Committee composed of individuals from various levels of the organization was created and met regularly to develop and implement strategies for implementation of the Communications Plan as per the implementation plan. This committee (now called the Strategic Marketing Committee) continues to meet and focus on communications with the goal of rebuilding trust in the district to increase enrollment.
4. A representative of LACOE had been assigned to the district and led the committee, which includes a representative group of district community partners (i.e., parent, principal, district staff, two board members, and representatives of the alumni association and bargaining units). The LACOE representative has since left the district. For most of this review period, a district project coordinator was managing the communication efforts. However, in February 2022, the district filled the executive director of communications position (formerly the executive director, school and community relations) who is taking the lead on communication efforts and will head the Strategic Marketing Committee.
5. A new communication plan was developed for 2020-21 that had a dual purpose; communicate with those affected regarding the COVID-19 pandemic and about other general, annual school items. The plan was more of an internal document than the previous plan and was intended to be iterative in that it is updated as needed. It included communication strategies, action steps, and clear timelines. In addition, it incorporated guidelines for media relations, social media, and crisis communication. This plan has been updated for 2021-22 (the intent is to update the plan each year with the possibility of a multiyear strategy in the future). The purpose included in the plan clearly shows that the audiences are both internal and external community partners and states the following:



The purpose of the IUSD communications plan is to outline the strategies the district will take to ensure we build relationships with our stakeholders by establishing consistent and transparent streams of information.

While it continues to provide timelines, guides, strategies, etc., this update has been drafted with an eye to the future. It has been drafted with less date specific information and more guidance so that it can be updated and act as a framework that can be adapted as the organization evolves.

6. Site principals and department directors providing information to their respective staff continue to be a primary source of internal communications. In addition, the administration contacts district staff through numerous means. At the start of the 2021-22 school year, the administration held an all-staff professional development meeting, as well as an administrative retreat, which provided an opportunity to provide staff with an update on the state of the district.
7. During the 2019 review, the district contracted with VMA Communications to lead its communication efforts. VMA Communications built on the 2017 Communications Plan and 2017-18 Communications Multi-Phase Implementation Plan and augmented and refined them as necessary. While no longer working with the district, VMA Communications established a process that continues; using data collected (e.g., enrollment losses, clicks and likes received on social media platforms, etc.) to gauge engagement and effectiveness and target communications efforts (e.g., updates on school reopening). District staff provided examples of how data collected from parent groups, the Strategic Marketing Committee, and communications surveys, are used to target communications and make improvements on what and how information is being provided. For example, comments made by the parent advisory committee and a review of hits for various webpages resulted in a more direct link to school lunch information, which previously required the use of a drop down menu that was not as easily accessed by parents.
8. FCMAT was informed during the 2021 review that the county administrator assigned the Strategic Marketing Committee to continue with all communications efforts. The district also hired a graphic designer to work with the committee and provide a more consistent appearance to the district's marketing efforts, including communications, billboards, the website, and other marketing materials.
9. The district continues to actively communicate with the community as evidenced by the updating of its website, the use of School Messenger, increased messaging through various media channels including social media, and various community events attended by district administration and advisory board members, although these in-person events have been curtailed due to the pandemic. The county administrator sends weekly "Message from the County Administrator" emails (which are also posted on the website and periodically published in the city's newspaper, Inglewood Today), as well as periodic notices about important and upcoming events and news items. The district continues to work with the local news media and use its website to inform the community of positive activities such as district, school, and student accomplishments, and fosters partnerships with local organizations, businesses, and the city.



10. Prior to the pandemic, during fiscal year 2019-20, the district held a student outreach day where staff and others visited churches, businesses, and other civic organizations to provide information and flyers and display posters about the district. During the current review period, it held a family resource fair in the summer of 2021 to encourage enrollment and connect the community with services and resources. The district continues to work with the city to access space on the digital billboards located around the community. Lastly, the district has created videos about the district and its students, and a gallery of all videos continues to be available on its website.
11. The district has several community partners/donors (e.g., Marvin Engineering, Los Angeles Rams and Chargers, SoFi Stadium, Social Justice Learning Institute, etc.) that provide programs and services for students. In addition, the Inter-governmental Relations Committee with the city of Inglewood, where the county administrator and two board members meet with the mayor and invitees to discuss areas of collaboration and district support, has continued to meet.
12. Updates continue to be made to the website to make it more user friendly and up to date. Website maintenance is more centralized, with a limited number of staff members assigned to upload and update information and work with school personnel who are responsible for updating and uploading information for their respective sites. During the 2021 review, principals reported that training was provided on editing, navigating, and uploading documents to the website. The district's project manager worked with site and department staff during this review to ensure consistency and regular maintenance of the site and provided individual trainings to new staff as needed. In addition, the graphic designer helped provide consistency to the website both for the departments and the school sites. This approach has continued to reap benefits with the website improvements evident.

## **Recommendations for Recovery**

1. The district should continue to refine its efforts tracking social and electronic media contacts, maintaining detailed feedback logs, keeping records of its communication efforts, and issuing communications surveys to gauge the progress and effectiveness of its communication efforts in reaching those affected and their reactions. For example, the district noted that it held a family resource fair where enrollment was heavily pushed. Success was measured by the number of people that enrolled while at the event, but the number of people that attended the event was not tracked. This additional metric would help the district better understand if the event was successful in reaching and engaging parents and the broader community, as well as determine what percentage attended but might not have enrolled a student.
2. District and school site leadership should continue creating videos and posting them on the website so that there is another mode of sharing updates with the community on the district and its accomplishments/obstacles.
3. The county administrator should continue to use the district's website and YouTube Livestream so that members of the public can more easily access district information

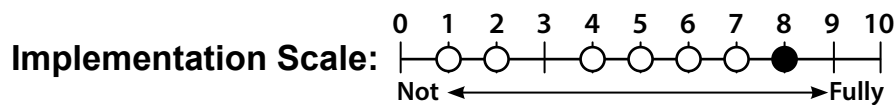


and/or meetings. The district should also look to reinstate other events to engage the community and increase enrollment, like the student outreach day held in 2020, and continue the family resource day held in the summer of 2021.

4. While the newly hired executive director of communications will be responsible for website consistency, monitoring its implementation, and ensuring continued access to up-to-date and relevant information, including the school's webpages, the district should formalize the process through written guidelines that are provided to individual departments and school sites assigned to update their respective webpages. Further, written districtwide protocols regarding appropriate posts, frequency of updates, quality control, etc., should be established.

## Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 1.2 Communications

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### Professional Standard

Information is communicated to the staff at all levels in an effective and timely manner. Two-way communication between staff and administration regarding the LEA's operations is encouraged.

### Findings

1. The opportunity for two-way communication between the staff and administration continues to improve. Staff and parents interviewed noted that the relay of information from the site principals to school site staff and parents is effective, although still not always consistent from school site to school site. There are multiple channels of communication and ways in which staff and parents can access information, with most staying up to date via the county administrator's weekly messages.
2. Central office personnel continue to express satisfaction with the communication between staff, district leadership, and the county administrator; and continue to be complimentary of the progress made and the efforts implemented by the county administrator, the general tone of communications, and the district atmosphere.
3. Administration continues with its efforts to ensure all staff receive timely communications. The application "Constant Contact" is still used as affirmed by staff interviewed, as well as School Messenger, email, and other notifications provided via school site administration. In addition, the weekly messages from the county administrator are sent to all staff and are available on the district's website. Further, the administration sends memos and other communications to specific employee groups as needed.
4. The CAO continues to hold virtual meetings with the principals, although they are shifting back to in-person meetings soon. The principals indicate overall progress continues, and the county administrator is present and engaged. Similar to the 2021 review, the principals continue to indicate they receive an abundance of communication, and their input is solicited and considered. They are provided with professional development and support from the various district departments (e.g., Business Services, HR, Educational Services, etc.) and have a sense of the district's direction instead of being uninformed as in the past. However, they expressed a desire for greater support from the administration and Business Services in particular when considering new initiatives. Instead of strictly focusing on which account code string is appropriate for a given expense — a compliance mindset — they see a need for collaborative discussions regarding desired services or programs and how and which funding sources allocated could be used to meet those needs.
5. The administration continues communicating with the school sites to disseminate information in conjunction with the work happening at the district level. In fact, in addition to the talking points that Educational Services began providing in the 2021



review, the department also now provides short videos to principals that can be shared with site staff. While this approach has benefits, including clear direction and consistent messaging, some staff indicated this shift to a top-down approach has resulted in school sites making less of their own school site focused decisions. Although staff acknowledge the benefits of this approach, it has limited site administrations' ability to pursue initiatives some would like to pursue for their specific site. However, staff also indicated they are aware of district developments, are included in most conversations, and are asked for their input. While staff noted that there continues to be room for improvement, they acknowledge the district is moving in the right direction.

6. While the senior cabinet remained relatively stable since the 2021 review, once again there have been vacancies at the administrative/director level. The organizational structure is continuously evolving — both in terms of people and the frequent revising of the organization structure itself — affecting day-to-day operations and implementation of systems. The county administrator has again made changes and deleted/added positions to the organizational structure. During the 2021 review, the IT Department was moved to the Educational Services Department. The Student Services Department was renamed the Student Services and Operations Department and placed under the responsibility of a newly created COO position. Maintenance, operations, and transportation functions were moved to this newly reconfigured department and directly overseen by an interim deputy chief maintenance and operations officer. The Business Services Department retained oversight of facilities and construction related to bond projects under the direction of a newly hired deputy chief construction management officer. The CBO had been with the district for only a few months at that time.
7. The latest organization structure, approved on January 26, 2022 (although it should be noted that this was a change from a prior structure approved just a few months before), shows that maintenance, operations, and transportation, along with its deputy chief maintenance and operations officer, have been moved back under the direct supervision of the CBO. The COO is therefore only providing oversight to student support services. The IT Department moved back under the supervision of the CBO except for Educational Technology, which stayed under the supervision of the CAO. The former chief HR officer resigned shortly after the last review and has been replaced by a LACOE employee on an interim basis. The executive director, HR has resigned, and the position will not be filled. The county administrator has created an executive director of compliance that is intended to manage compliance as well as the risk management functions of the former executive director. Given the job duties, it appears that the position will be housed under HR; however, the organizational chart shows the position reporting directly to the county administrator. Another change, as previously noted, is the district's filling of the vacant executive director of communications (formerly the executive director, school and community relations). Lastly, another LACOE employee is working to support the county administrator in the role of associate superintendent.
8. The frequent changes to the organization — both in terms of people and the organization itself — inhibit the district's ability to provide a functioning and effective organizational structure, are taxing on staff, and are of significant concern. A stable organization cannot be developed or sustained under these conditions, as has been evident in the time since



the district entered state receivership. Frequent changes in staff, the chain of command, and procedures are disruptive to the organization.

9. In addition to district employees, other individuals — some of which are noted in the prior finding — are still assigned to the district that are employees of and/or paid for by outside agencies (i.e., LACOE and the CCEE. This group is part of the LACOE Support Team and is providing support and assisting with capacity-building in strategic areas that have been identified as part of the FCMAT and other reviews as areas of critical need (e.g., improved instruction, facilities, special education, etc.) as documented in the monthly progress reports issued by the county administrator.
10. The executive cabinet continues to meet at least weekly with the county administrator. A precabinet meeting is held by the chief HR officer, CAO, COO, and CBO to prepare for the executive cabinet meeting with the county administrator. A weekly principals' meeting is held and attended by all district leadership, and the agenda alternates between operational and instructional issues. In addition, each cabinet member also holds regular meetings, either one-on-one and/or by department, with his or her respective staff to further improve communications.
11. The county administrator meets regularly with the ITA, the district's classified bargaining unit — now California Teamsters Local 911, and the Inglewood Management Association. The agendas are determined by topics of interest and relevance to both parties at the time.
12. During prior reviews, various meetings and events were held at school sites (e.g., the previously mentioned principals' meetings, PTA meetings, trainings, etc.) to provide the administration with opportunities to interact with school site staff in a more meaningful way. When issues arose at school sites or other events occurred, all executive cabinet members attended and provided a unified presence. The pandemic has continued to inhibit these in-person meetings and events, although the administration plans to have in-person meetings soon.
13. The administrative handbook developed during the 2017 review period is now accessed by a link on the Human Resources Department webpage and requires login information. FCMAT's team could not access the handbook. Interviews with staff indicate the district's intent to move away from the prior handbook model and include everything on the website — removing the need for a log in and password and allowing for easier access by staff. Interviews with staff confirmed that much of what is needed is available on the website, and documents, procedures, etc. are continually added. Links to various forms and individual procedural department/employee group handbooks. However, not all the data and forms are up to date.
14. The former state administrator initiated a strategic planning effort in October 2017. The effort included a series of meetings where staff, along with the greater Inglewood community, had the opportunity to provide input on the district's future. The 2018-2023 Strategic Plan was adopted in November 2018 and includes an updated mission statement, and the establishment of an equity principle and seven core beliefs. The county



administrator is honoring the work and community input that went into the creation of the Strategic Plan and has used it as the starting point in defining specific and measurable next steps.

## **Recommendations for Recovery**

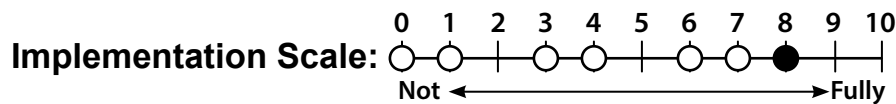
1. The county administrator needs to develop a functioning and effective organizational structure that, while addressing district-specific needs, is aligned with industry standards and stable from year to year. The governance structure should be appropriate to the district's size and promote effective and efficient operations, as well as enforcing the county administrator's commitment to open and effective communication with the public and internal personnel.
2. Any changes in the organization should continue to be clearly communicated to all staff, and organizational charts should be updated and uploaded to the district website to provide a clear chain of command for staff and site administrators.
3. The administration should continue to migrate forms and other information formerly compiled within the district's administrative handbook to the district's website and ensure that all department forms and procedures are included. It should also clearly communicate the method and location of the forms and information so that all staff are aware that the information is accessible and available online. The forms and other data uploaded to the website should be updated at least annually prior to the start of the new school year and more frequently, if needed. Each department should designate a person to review its forms and complete these revisions.
4. The district should continue to pursue multiple avenues of communication for dissemination of information and input-gathering to meet its varying needs. Opportunities for providing input and receiving communications should be readily available, easily accessible, and clearly established so that all staff can participate. It is important that the district administration continue to ensure all staff stay informed and are included and provided with multiple opportunities for engagement. Notices of opportunities to learn about the district should be disseminated through multiple avenues.
5. The county administrator and district central administration should continue to coordinate with school site administrators and department heads to allow them to participate in staff meetings. This will provide all staff members with access to district decision-makers and create a more collaborative and inclusive decision-making process.
6. The county administrator should continue to use school site principals and department heads as messengers to their respective staffs and communities, as well as continue districtwide messaging efforts. Further, the county administrator should ensure the communications protocols included in the communications plan are updated as needed to indicate how and when site administration should communicate with site staff and parents. The district should continue to provide cogent and timely talking points, videos, and information to site principals and district office administrators to share with their respective staff and those affected.



7. The county administrator should continue her increased collaboration with the school sites in advance of implementing changes that will affect operations. This will build further trust and acceptance from staff and allow school sites time to prepare for changes and adjust staffing and resources accordingly.
8. The county administrator and executive cabinet should continue to keep employees informed. This is key to building trust and acceptance. For the district to succeed in both the short- and long-term, staff must feel that they are a part of the process, understand why decisions are made, and realize that these decisions are in the district's best interest.

### Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 1.4 Communications

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### Professional Standard

Individuals not authorized to speak on behalf of the LEA refrain from making public comments on board decisions and the LEA's programs.

### Findings

1. The county administrator has filled the executive director, school and community relations position, now renamed the executive director of communications. Questions received by the district are typically directed to the county administrator or the COO in the administrator's absence. In addition, the district regularly consults the LACOE executive director of communications when responding to public requests.
2. Advisory board members appear to understand their roles and their limits of speaking for the district. During the last review, a member of the public filed a complaint with LACOE regarding comments made to the media by an advisory board member who has since resigned from the board for unrelated reasons. According to the complaint, the advisory board member expressed a personal opinion, but was not clear about this when speaking to the reporter and was therefore quoted as representing the district. The matter was investigated by the LACOE deputy general counsel who concluded there was no violation of board bylaws. The county administrator addressed this at the district's September 16, 2020, board workshop. She specifically addressed the comments made by the advisory board member, clarified that his statements did not represent those of the district, and stressed the need for all advisory members to be aware of how their comments can be taken. For this review period, no further instances have been brought to FCMAT's attention.

### Recommendations for Recovery

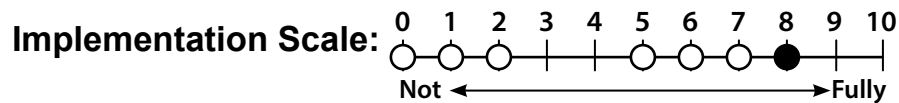
1. Responsibility for district communications should shift now that an executive director of communications has been hired, and given the change to the COO position. The executive director of communications should be responsible for overseeing the Strategic Marketing Committee, any associated district contractors, managing all external communications, and should be designated as the individual in charge of the district's website and ensuring that it is updated and consistent across school sites.
2. All media requests should first go to the executive director of communications who can, in consultation with the county administrator if necessary, either respond or determine the appropriate key staff member to respond if a content area expert is required. This will allow the district to track contacts with the media and ensure that reporters are not seeking answers that confirm the article's presuppositions. This structure will also ensure that the district delivers a single message and communication is consistent, while recognizing that both the advisory board members and other senior cabinet members have roles in disseminating information throughout the district and the community.



3. As the advisory board continues to take part in more aspects of district business, training should be reinforced on appropriate methods for communicating with the public to provide one message on district matters and clearly stating when they are speaking as a board member or expressing personal views. As part of their ongoing training, board members should continue to be reminded of the limitations on their authority as an advisory body when it comes to committing district resources or support.

## Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	2
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 2.3 Parent/Community Relations

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### Legal Standard

The LEA has developed and annually disseminates uniform complaint procedures. (Title 5, Section 4621, 4622)

### Findings

1. AB 1575 was signed into law on September 29, 2012, and mandates the use of uniform complaint procedures for resolving complaints of alleged violations of the laws that prohibit pupil fees, deposits, or other charges for student participation in educational activities. Changes were approved by the Office of Administrative Law and were effective July 1, 2020, based on changes passed in 2018 as part of AB 1808. Updated policies and regulations also require the use of these procedures to address complaints of discrimination, harassment, intimidation, and bullying, as required by the CDE.
2. The district's board policies are available on its website, and BP 1312.3-Uniform Complaint Procedures was updated on September 9, 2020, and the administrative regulations were updated on April 17, 2019.
3. The district's website was restructured prior to the 2021 review for the uniform complaint procedure process, which includes forms, instructions, and general information regarding process, as well as links to the CDE for further information. The Uniform Complaint Procedures (UCP) Complaint Form icon provides both a link to a software application called Informed K12 allowing the individual to fill out and submit the form online as well as a downloadable blank copy of the form once the person's name and email are entered. The district's uniform complaint procedures annual notice and policies and procedures can be viewed on the website or downloaded. The updated webpage and fillable online form are a vast improvement from previous reviews and addressed the corrections noted in prior comprehensive reviews.
4. Although a link has been added to download the Spanish-language Annual Notice since the last review the website still does not include Spanish translations of UCP forms or the policies and procedures in compliance with EC 48985. Therefore, nonnative English speakers will continue to have difficulty accessing the information and understanding how they should proceed.
5. While FCMAT was provided with only the English-language version of the 2021-22 UCP Annual Notice, as well as a copy of an email that was sent to all staff regarding the notice and accompanying training, as part of its document request, the district's website has now been updated and includes a copy of the 2020-21 Annual Notice in both English and Spanish. Additionally, FCMAT was provided with an annual notification completion report titled "Keenan Vector Training, K-12 Edition Training Compliance by Person" that appears to track each employee, their position, location, and whether the employee completed the "assignment," which was acknowledging receipt of the annual notice. Of the school sites FCMAT visited, all had copies of the UCP brochures and forms available at the site's front office.

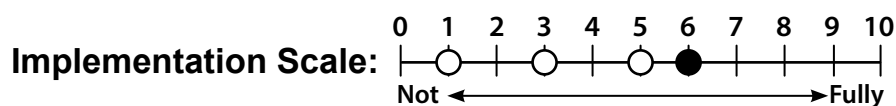


## Recommendations for Recovery

1. The district should continue to monitor the uniform complaint procedures to ensure compliance with any changes in law. In addition, the district should continue to provide annual notices to all district staff, parents, and advisory board members and make them available on the website and all district locations.
2. The district staff person assigned to monitor uniform complaint procedures should ensure that Spanish translations of the website and downloadable forms are provided to ensure ease of access for all those affected.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	6
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 2.4 Parent/Community Relations

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### Professional Standard

Parents and community members are encouraged to be involved in school activities and in their children's education.

### Findings

1. The district has citizen advisory, school-connected organizations, and volunteer policies (BP 1220-Citizen Advisory Committees, BP 1230-School-Connected Organizations, and BP 1240-Volunteer Assistance). BP 1220 was revised on August 20, 2014, although the administrative regulations were updated on April 17, 2019. BP 1230 and BP 1240 were revised on September 19, 2018.
2. Staff interviewed noted that the district's parent center is still open and a resource for parents. In addition, the district is establishing parent centers at each school site with community liaisons also assigned to each school. Most schools have dedicated space and community liaisons already operating, while a handful of others are working on making space available and/or are working to fill their community liaison positions. Several parents interviewed noted that they had never been to the district parent center, but have accessed the one at their child's school. FCMAT was also provided with numerous announcements from the various school sites and the district encouraging parents and students to take part in back-to-school nights, drawing workshops, read across America events, a virtual student town hall, PTA meetings, etc.
3. Interviews with school site principals, district administration, staff, and parents, as well as documentation provided to FCMAT, show that the school sites, the parent centers, the ELAC, and the DELAC have continued to make efforts to encourage parents and community members to be involved in school activities, personal growth opportunities, and in their children's education. The district and school sites continue to contact parents by phone, email, and text message. Even with these efforts, the level of participation among schools continues to be inconsistent, and relatively few parents are involved districtwide. The pandemic has further depressed participation with principals noting that it is harder to engage parents in a virtual setting. Nevertheless, most parents interviewed appreciate the district's parent center, were excited about the school site-based centers and community liaisons, and the offerings provided. They indicate they receive communication from the district, their school sites, and the parent centers, as well as through the district's website and social media platforms.
4. During the 2019 review, the district hired an additional community liaison, allowing it to provide more support to ELAC, DELAC, and the school sites as well as to help with outreach to homeless and foster youth, which continued during the 2021 review. While the two community liaisons are still providing support districtwide, for the 2021-22 school year, the district also funded a new community liaison position at each school site. The community liaisons have begun meeting to collaborate and receive training. FCMAT



was provided with copies of training presentations, as well as their meeting and self-care sessions schedule, handbook, and meeting agendas.

5. The Parent Learning Resources webpage of the district's website continues to be updated and includes numerous links for virtual supports offered to parents, from a Parent/Family Community Resource Handbook to Imagine Learning at Home-Family Support. Through various links, the website provides information about volunteering, school calendars, and general information on the types of activities and organizations available throughout the district. The website also includes a "Parent Portal" link that gives parents access to their child's grades, attendance, and more. The district is tracking the number of parent accounts by school site. The inconsistency found during the last review between the Upcoming Events section and the calendar link has been corrected with the removal of the Upcoming Events section. Instead, there is a District & School Calendars link that appears to show all events held each month and can be filtered by school site. The sample of events selected by FCMAT shows that each event includes a link which expands to provide more detail on the event.
6. The district has an education foundation (The Inglewood Educational Foundation) that was established in 1998 as a nonprofit corporation organized under the nonprofit Public Benefit Corporation Law Section 501(c)(3). The foundation's primary purpose is to provide college scholarships to graduating students and supplemental financial support for a variety of educational programs that directly benefit students and teachers. The foundation was reinstated during the 2017 review period and continues to meet, raise funds, and provide awards. The foundation has a total of seven board members, one of which is an advisory board member. In addition, the foundation has designated officers.
7. The foundation continues to raise monies and receive in-kind donations and provide grants and other donations to various district programs, including donating money for the parent E-Art Sustainability Program six-week training, arranging food giveaways, and providing grants for teachers to help cover the costs of expenses incurred for the benefit of their students. Summary documents were provided showing fundraising activities and in-kind donations received, as well as some of the grants and other donations provided, covering April 2020 through January 2022.
8. During the 2021 review, the district provided documentation that the foundation has not conducted a meeting since March 2020 due to the pandemic and the lack of sufficient members to constitute a quorum. However, the document indicated that it has continued to conduct business via email. Based on documentation provided during this review, the foundation started having virtual meetings in November 2021 while also continuing to conduct some business via email. A link to the foundation's independent website is included on the district's website. Also, the district has the foundation listed as a "district committee" on the district's website, which is inaccurate given the foundation's role. The foundation is not a committee convened by the school district to provide input and feedback on district matters.
9. Per interviews with district administrators and parents, the district is still striving to fully engage parents at all school sites and gain their participation in site-based PTAs. FCMAT



was provided with documents supporting participation in and elections to school-site PTAs. The Parent Learning Resources webpage link to the IUSD Parent Teacher Association, where the local PTA district council shared a message and offered support to school sites looking to establish a PTA, has been removed. Searching for “PTA” on the site provides a result for the IUSD PTA but clicking on the link results in a 404 error noting that the page cannot be found. During prior reviews, it was noted that some school sites have PTOs instead of PTAs. FCMAT has not been able to confirm if this is still the case. The county administrator attends PTA/PTO meetings as do other cabinet members when requested, and the district is actively encouraging and supporting school sites wishing to establish either organization. Staff noted that part of the role of the school site-based community liaisons is to recruit parents for the PTA and other parent groups (e.g., SSC, ELAC, DELAC, etc.)

10. Participation still varies from school site to school site; some schools have strong, active, well-organized PTAs/PTOs and SSCs, while others do not or struggle to get parents involved. The pandemic and virtual environment again have been a barrier to getting participation. Parents continue to indicate that communication is better than in the past although there is still room for improvement. While some school sites have a more difficult time involving parents, none stated that they are uninformed as in past reviews. Parents who are more involved in the PTA/PTO, SSCs, or even their school sites still appear to be able to access information more readily than their counterparts who are not involved with these activities. Parents receive information through multiple media (e.g., via email, phone messages, or text), but the primary sources appear to be Constant Contact, School Messenger, the district website or the district social media offerings.
11. EC 52060 requires consultation with various groups, including parents, in adopting an LCAP. The LCAP template states that “[m]eaningful engagement of parents ... is critical to the development of the LCAP and the budget process.” The district provided documentation showing meetings of the LCAP Advisory Committee were held and that parents attended those meetings. The district’s website does not appear to include surveys or other information regarding the 2022-23 LCAP, although interviews with staff noted that they are being developed and used. LCAPs must be adopted by June 30.
12. FCMAT was provided with agendas and sign-in sheets for the district’s LCAP Advisory Committee, with the first one held on October 5, 2021, and agendas provided through December 7, 2021. However, staff overseeing the LCAP Advisory Committee and the LCAP process as a whole stated that the committee meets throughout the year beginning in September. These meetings occur once or twice per month depending on the stage of the LCAP process. Additionally, the executive director, federal and state programs take the LCAP on a “roadshow” to all parent and student groups before revising and submitting for board approval.
13. In addition to the LCAP, several other reports and plans were required to be completed in the 2021-22 fiscal year (e.g., one-time supplement to the LCAP, Elementary and Secondary School Emergency Relief Fund plan, Educator Effectiveness grant, etc.). Staff noted that the LCAP Advisory Committee was used to help develop and provide feedback on all these plans. FCMAT was provided with agendas and sign-in sheets supporting these activities.



14. EC 52065 requires a district to post its LCAP on the district website. The 2017-18, 2018-19, 2019-20 (both original and revised), and 2021-22 LCAPs are posted, as well as the 2020-21 Learning Continuity and Attendance Plan that was required in place of the LCAP.
15. The district has two district-operated charter schools. The Education Code, which makes no distinction between district-operated or independent charter schools, requires that all charter schools prepare an LCAP separate and apart from their authorizing agency. In addition, due to changes implemented by Senate Bill 75, the district is required to post the LCAPs (or links to the LCAPs) for all charter schools it authorizes on its website. Each charter school is also required to post its LCAP on its respective website. As during past reviews, FCMAT was not provided with any evidence of an LCAP process for the district-operated charter schools. However, for the first time, draft 2021-22 LCAPs for both district-operated charter schools are posted on the district website and on each individual school site's website. Links to the LCAPs for the district-authorized independent charter schools could not be located.

## **Recommendations for Recovery**

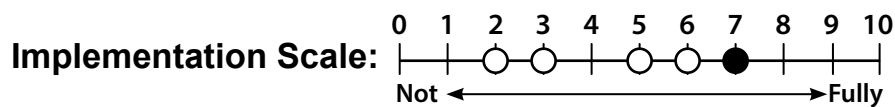
1. FCMAT continues to recommend that each school site develop specific tasks that parents interested in volunteering can complete depending on their level of availability. These will provide parents with more concrete ideas of how to help, ensure a task is outlined for those who volunteer, and make certain they can engage in that activity immediately.
2. The data and records kept gauging the level of parent use of the district website should continue to be used to inform the process and determine which offerings are successful and which need intervention or reconsideration.
3. While several webpages include Spanish-language translation or documents, the district should continue to work toward ensuring all links and information available on the website geared toward Spanish speakers are in Spanish. One example is the uniform complaint procedures noted in Standard 2.3.
4. The county administrator should continue to provide support for the creation of school site and districtwide PTAs/PTOs, as well as the parent centers in their outreach and parental education efforts. Further, FCMAT encourages the district to complete the process of establishing dedicated spaces at each school site for parent centers as they can provide an introduction to the campus and be a one-stop shop for parents. The community liaisons should continue to meet and collaborate to ensure that while they address their specific school site's needs, they also communicate cohesive messages and make opportunities available to all district parents. The parent centers should strive to ensure that parental involvement includes high-quality partnerships to improve student achievement throughout the district. Lastly, the IUSD PTA webpage should be reestablished.



5. The district should continue its efforts to obtain meaningful parent involvement in the LCAP process and ensuring that a comprehensive engagement process is replicated each year, in person or virtually.
6. The district should ensure that its district-operated charter schools develop a similar engagement and development process and complete LCAPs annually as required by law and post their final LCAPs on their own webpage, as well as the district's webpage. In addition, the district needs to ensure that district-authorized independent charter schools have posted their final LCAPs on their own webpages and that the district's website at least contains a link to each.
7. The district should continue to encourage the development of the Inglewood Educational Foundation and support its efforts. However, the foundation should not be listed on the district's website as a district committee.
8. The district has integrated the various communications systems to ensure the accuracy of parent contact databases. It should continue to monitor these databases to ensure they remain reconciled as technology is updated and parents sign up for communications via various mediums. In addition, all technology should be able to send messages to parents in their primary language, including postings on the website.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	5
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7





## 2.8 Parent/Community Relations

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### Professional Standard

Board members are actively involved in building community relations.

### Findings

1. Based on interviews with staff, teachers, parents, district administration, and advisory board members, advisory board members continue to be actively involved in building community relations.
2. The advisory board members continue to attend graduation and other community events virtually and/or socially distanced and actively communicate with the city of Inglewood, the Chamber of Commerce, the religious community and organizations, private organizations, and others to establish relationships outside of the district and bring resources to the district. In addition, the advisory board appointed various board members to represent the district in other local committees/organizations (e.g., Los Angeles County School Trustees Association, Southern California Regional Occupational Center, etc.).
3. The district has continued to recognize and honor parents, staff, and students during the first portion of the board meeting as reflected on board agendas, and the board meetings continue to include reports from students on events and accomplishments at their school sites. A schedule for 2022 has been established. The amount of time spent on recognitions, student reports, etc. during board meetings was significantly reduced at the March 9, 2022 board meeting attended by FCMAT compared to the board meeting attended during the 2021 review period.
4. Because of the COVID-19 pandemic, all board meetings have been live streamed on YouTube Livestream and past meetings are archived and can be viewed by the public. Links for current and past board meetings are available on the district's website.

### Recommendations for Recovery

1. The county administrator should continue to encourage and support the advisory board members to be actively involved in the community and build positive relationships with all segments of the community. With operational support provided by the district as needed, the advisory board members should continue to assist the district with its outreach efforts. While the advisory board has no authority, members can continue to assist the district in carrying its educational message to the community and continue to provide the district with input from the community.
2. The district should continue to hold the honorary portion of its board meetings so that staff members and the community can participate in these contributions and recognitions. The time allocated to this portion of the board meeting should continue to be limited. The main responsibility of the governing board of any district is to conduct district business,

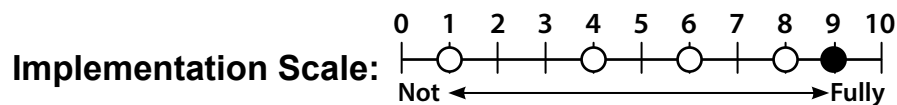


and the majority of any board meeting should be spent doing so, with honors and recognitions encompassing less time.

3. The district should continue to live stream its board meetings and include links to the archives on its website, even after the need is no longer there as in-person instruction and board meetings return, so that the public can view the board meetings at its convenience. This provides greater transparency of district operations.

## Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	9





### 3.1 Community Collaboratives, LEA Advisory Committees, School Site Councils

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#### Legal Standard

Policies exist for the establishment of school site councils. The school site council develops a single plan for student achievement at each school, applying for categorical programs through the consolidated application. (EC 52852.5 and 64001)

#### Findings

1. The district updated AR 0420 and BP 0420 on April 17, 2019, to reflect changes pursuant to Assembly Bill 716, which repealed EC 52852.5, made amendments to EC 64001, and added EC 65000. EC 64001 requires that a SSC develop the SPSA, while EC 65000(b) requires that, “A school that operates a program that requires a School Plan for Student Achievement, pursuant to Section 64001, shall establish a school site council.” The council’s responsibilities include developing and approving the plan, monitoring its implementation, and evaluating the effectiveness of the planned activities at least annually.
2. FCMAT was provided with presentations, agendas, and sign-in sheets for districtwide trainings to SSC members. Additionally, various school site agendas showed that training was included on the purpose, makeup, scope, etc. of SSCs and school plans for student achievement. The meetings also included discussions and approvals on Title I funding and its interaction with SSCs and school plans for student achievement. Further, the district’s Educational Services Department website includes a page for SSCs, and a training packet, PowerPoint presentation, and other resources are provided for download.
3. FCMAT was provided with copies of agendas, sign-in sheets, and meeting minutes for site-based meetings of SSCs for all school sites, and district staff reported that the district held virtual trainings.
4. During the 2021 review, FCMAT was provided electronic copies of the 2020-21 school plans for student achievement, which were approved by the county administrator at the February 24, 2021, board meeting. During this review, FCMAT was provided with the same plans, but with the school year changed from 2020-21 to 2021-22. A quick comparison shows that the plans are otherwise identical, including the approval dates by the SSCs and the board, as well as the total funds budgeted.
5. At the December 15, 2021, board meeting, an item was presented to extend the 2021-22 plans through June 30, 2022. The agenda item notes that the plans are effective through February 24, 2022, and the extension would allow for the full 2021-22 allocated funds to be expended, while also allowing staff to align the 2022-23 plans to the fiscal year (as discussed in finding 6 below). This was an error since the plans extended were those from 2020-21. At the March 17, 2022, board meeting, district staff partially corrected the error, and the revised item correctly requested an extension of the 2020-21 plans through the end of the fiscal year, although it failed to correct the inaccurate statement referencing the 2021-22 funding allocation.



6. While the district intent is clear and it was attempting to align the plan to the school year (discussion in finding 7), there are several issues with the action taken. Since no updated plans were approved by SSCs or the county administrator for 2021-22, the action appears to in fact extend the 2020-21 funding allocation and not the 2021-22 funding allocation. Second, without the development and approval of 2021-22 plans, federal funds allocated to the district for 2021-22 cannot be expended by school sites. Third, FCMAT was not provided with sufficient information to determine whether school sites have received allocations for 2021-22 and simply do not have plans in place to allow for their expenditure or whether no allocations have actually been made for the 2021-22 fiscal year. This could have serious implications on the district's federal funding since, for the purposes of Title I, the district is required to allocate Title I funds to school sites with at least 75% free and reduced-price meal eligibility. In this case, it appears the district allocated funds to school sites without a plan or has potentially withheld dollars from the school sites with greater than 75% free and reduced-price meal eligibility that do not have plans. The extension of the plan is insufficient to expend the 2021-22 allocation. Lastly, although minor in comparison, both the board report and the plans themselves reference the title Single Plan for Student Achievement. This reference is outdated as the modifications to law in 2019 changed the title to School Plan for Student Achievement.
7. During the 2019 review, staff stated the district wanted to change the calendar for plan development and approval to July through June to coincide with the school year instead of midyear development and approval as is the current practice. Teachers and district administration noted that development of the plans and budgeting of funds allocated through the plans are delayed and affect the school sites' ability to expend the funds in a timely manner. This change has not taken place, but the agenda item referenced in finding 5 above shows staff's intention to align the plans with the fiscal year starting in 2022-23. The SSC training slide deck, as well as interviews with staff, note that school sites will begin to work on the 2022-23 plans in March 2022 for approval by the board in May/June 2022.

## **Recommendations for Recovery**

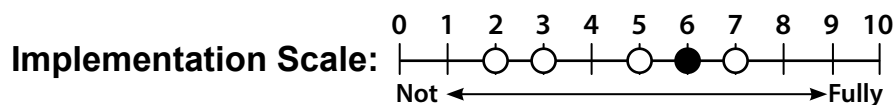
1. The district should continue to monitor the board policy on SSCs and school plans for student achievement to ensure compliance with any changes in law. In addition, all references to single plan for student achievement should be updated.
2. The district should continue to provide annual training to members of the SSCs directly and to the school site principals so they can adequately train and guide the councils in developing plans.
3. The district should continue to monitor the formation of SSCs before the end of the school year to make certain that one exists at each school at the start of the next school year.



4. The district should ensure that the SSCs annually approve the school plans for student achievement and that the SSC meeting minutes reflect this. District administration should also ensure that funds are allocated annually with approval by the governing board/county administrator.
5. The district's policies and procedures should codify the process of calibrating school site plans across school sites by holding an annual meeting. In addition, the policies should be updated as proposed to adjust the plan development cycle to coincide with the school year. This will allow for the timely approval of the plans and expenditure of funds earlier in the school year.
6. The administration should continue to ensure that all school sites are developing agendas, keeping meeting minutes, and requiring participants to sign-in for SSC meetings and that this documentation is retained by the school sites for review and verification by the district.

### Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	5
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	6





### 3.4 Community Collaboratives, LEA Advisory Committees, School Site Councils

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#### Professional Standard

The board and superintendent have established broad-based committees and councils to advise the LEA on critical issues and operations as appropriate. The membership of these committees and councils reflects the full cultural, ethnic, gender and socioeconomic diversity of the student population.

#### Findings

1. The district has established broad-based committees or councils to advise or provide it with input on critical issues and operations. Documentation, including agendas, meeting minutes, and sign-in sheets were provided for some of the committees. In addition, the governance calendar showed the establishment of several committees (i.e., Budget Advisory Committee, Board Policy Committee, Inter-governmental Committee, Strategic Marketing Committee, Child Development Center Parent Collaborative Committee, Inglewood/Airport Area Chamber of Commerce Education Committee, etc.). These committees are county administrator- /board-appointed and include community members and businesses. Board meeting minutes showed the appointment of advisory board members to various committees.
2. The district still has DELAC/ELAC, school-based PTAs/PTOs, and a districtwide parent center, as well as some school site-based parent centers. During this review period, the district established both a county administrator student advisory council and a parent advisory council. The county administrator meets with the parent advisory council twice a month and it is made up of the PTA presidents. The county administrator provides information and updates and hears about events/issues happening at the school sites and works to address concerns and incorporate recommendations. The selection for the student advisory council involved an application process. More than 60 students submitted applications, and the county administrator did not want to turn any away, so they are separated into smaller groups for discussions. According to the application packet, the intent is to provide students the opportunity to share feedback, insights, and ideas with the county administrator and district staff. FCMAT was provided with schedules, agendas, and meeting minutes for these as well as site-based student advisory councils. Based on interviews with staff and parents, the various councils and committees are used to educate the participants and solicit feedback, hear about concerns, and receive recommendations.
3. The district established a Budget Advisory Committee during the 2018 review period which has continued to meet. FCMAT was provided agendas and meeting minutes spanning May to October 2021. Based on a review of the minutes and presentation provided, the committee appears to be primarily for educating the committee on the district budget and budget development.



4. The Citizens' Bond Oversight Committee is a broad-based group that is assigned to oversee the bond program. The district has consistently had this committee from year to year, but it has not met consistently. The district's website includes a page for the committee, which contains agendas and meeting minutes. During this review period, the committee met five times. The meetings do not appear to be established on any discernable set schedule, and the only remaining meeting listed is scheduled for May 2022. Based on the list provided on the website, the committee now consists of eight members.
5. Flyers, agendas, meeting minutes, rosters, and/or sign-in sheets were provided for the DELAC and ELAC. During the 2021 review, FCMAT located a webpage on the district's website that included the agendas and meeting minutes for DELAC/ELAC meetings. FCMAT could not locate the page during this review. There is reference to the committee on the Parent/Family Resource Centers page, and meeting minutes, agendas, and calendar events come up in search results if DELAC (both the acronym and full name) is entered into the search field.
6. The district convened a School Closure/Consolidation Committee to provide input and recommendation to the county administrator and the district on a plan to close/consolidate schools. The district used the committee structure detailed in EC 17387 et seq. for the selection of seven to 11 members representing specified representatives (e.g., teacher, business member, parents of student, etc.) and selected members based on an application process. Based on the documentation provided and review of the district's website, the committee held six meetings from September 2021 to January 2022, all of which were open to the public and livestreamed. Agendas, meeting minutes, video recordings, and other information about the process and the meetings can be found on the district's dedicated webpage. In addition, appointment of the committee members and updates on the committee's work were provided at various board meetings throughout the process.
7. However, while a February 2022 listening session can be found, the committee meetings do not appear on the calendar of events on the district's website and a quick review of the county administrator's weekly message could not locate any reference to the meetings or process. Based on anecdotes shared with FCMAT, at a meeting held at Warren Lane Elementary School—the school selected for closure in 2022-23 — on March 7, 2022 to discuss the transition of students for next school year, it became clear that despite the district's efforts, the impending closure took the Warren Lane community—specifically the community in and around the school site—by surprise. Some advisory board members indicated they were not aware of the meeting until just before it began.

## **Recommendations for Recovery**

1. The county administrator should ensure the established committees continue to be used primarily to advise the district on critical issues and operations and not simply to keep community partners abreast of district operations although this is one avenue in which to do so. The district should continue to regularly meet with these groups and consider their input in making decisions. Establishing committees and councils with knowledge of the



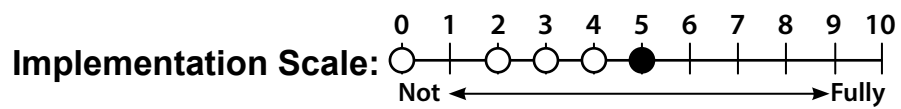
district, community, and its culture provides information that is critical and useful to the process. The district should continue to hold these committees as standing committees that continually meet throughout the year in order for them to provide knowledgeable insights based on ongoing experience.

2. In addition to convening new committees and/or councils, the county administrator should continue to take advantage of the already constituted DELAC/ELAC and focus those committees' efforts on current district issues as they arise. This would be similar to what occurred during this review period with the introduction of various new funding sources that required development of plans with community input.
3. The Citizens' Bond Oversight Committee should be trained to ensure members understand their roles and responsibilities. This and other trainings should be provided regularly as refresher courses (e.g., annual or as new members are added) to ensure the members are current with the latest laws and regulations. Further, similar to board meetings, the meetings should be established on a regular schedule, which should be posted online.
4. The committees and councils should include those affected in the district as well as district administrators and staff. The district should continue to make a concerted effort to ensure that membership reflects the full cultural, ethnic, gender, and socioeconomic diversity of the student population. This data should be collected and tracked to ensure that the committees reflect the diversity of the student population.
5. While school closures/consolidations are necessary to ensure the continued fiscal solvency of the district, and have been included as benchmarks in legislation, district administration should ensure that notifications and information for all future meetings are disseminated broadly and include not only typical district sources (e.g., board meeting agendas and website notifications) but broader-based community sources (e.g., Inglewood Today, flyers in student backpacks, mailings to affected neighbors and property owners, etc.). It is well within the county administrator's purview to close/consolidate schools, and some community members will likely not be happy or supportive of this decision; however, the community should be kept informed. In addition, this is an area where the advisory board members could help with outreach to the community. They should be informed in advance and consider taking part, particularly for schools within their respective trustee areas. This is critical as other school closures/consolidations will be necessary to match facilities to student enrollment in the district.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	5





## **3.6 Community Collaboratives, LEA Advisory Committees, School Site Councils**

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### **Professional Standard**

The LEA encourages and provides the necessary training for collaborative and advisory council members to effectively fulfill their responsibilities and to understand the basic administrative structure, program processes and goals of all LEA partners.

### **Findings**

1. Flyers, agendas, meeting minutes, rosters, and/or sign-in sheets were provided for the DELAC and ELAC. During the 2021 review, FCMAT located a webpage on the district's website that included the agendas and meeting minutes for DELAC/ELAC meetings. FCMAT could not locate the page during this review. There is reference to the committee on the Parent/Family Resource Centers page, and meeting minutes, agendas, and calendar events come up in search results if DELAC (both the acronym and full name) is entered into the search field.
2. Training for the district's SSCs is discussed in Standard 3.1 above.
3. FCMAT was not provided with any documentation showing that the districtwide parent center continues to hold workshops to train parent volunteers or workshops to assist parents as it has in the past. However, as noted in Standard 2.4, the Parent Learning Resources webpage provides resources for parents.
4. The district once again contracted to provide a virtual five-week Parent Engagement Academy FACTOR Program: Families Acting Towards Results, which focuses on the social, emotional and physical development of children from low-income families. The district's webpage no longer has a page for the program that lists the schools taking part. However, a search of the district's website resulted in calendar events and/or schedules for five of the district's school sites.

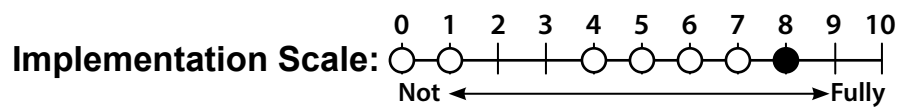
### **Recommendations for Recovery**

1. The district should continue to construct a schedule of annual trainings for all collaborative and advisory councils such as ELAC, DELAC, SSCs, etc., and ensure that the content helps members fulfill their responsibilities and understand the basic administrative structure, program processes, and goals, operations, and expectations of the councils. Trainings should continue to be held virtually until they can return to in-person. All school sites should be encouraged to have representatives attend these trainings.
2. The district should continue to provide support to the districtwide and school-based parent centers so that they can provide stable leadership to develop and train collaborative council members in their responsibilities regarding programs and processes.



## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 4.5 Policy

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### Professional Standard

The board supports and follows its own policies once they are adopted.

### Findings

1. A review of the district's policies via the GAMUT website found that while some policies were last updated in August 2014 or February 2015, most were more recently updated, ranging from September 2018 to June 2021 as part of an established review process (see Standard 5.10 for more detail). However, a few are older and were last reviewed as early as 2012.
2. The advisory board has experienced upheaval since the district entered receivership. Initially, advisory board members rarely attended board meetings, but this has changed significantly. During the 2021 review period (through the March 10, 2021, board meeting), 29 regular board meetings and 18 special board meetings were held, in addition to nine board member workshops. Of these 56 meetings, seven (or 12.5%) were held with less than four members present, and all these cases were for special board meetings. Further, in three of these cases, the reason was that there were two vacancies on the advisory board. During the current review period (through the March 17, 2022, board meeting), 16 regular board meetings, two board member workshops, and one special board meeting were held. Of these 19 meetings, none were held with less than four members present. In addition, all advisory board members were present at 78.9% of these combined meetings.
3. A review of board meeting minutes, interviews of advisory board members, and observation of the March 9, 2022, board meeting showed that the following findings made during the last several reviews still apply:
  - While the board has three new members that are still learning about the district and the full scope of its role, the advisory board members participated in board meetings by asking questions and taking part in discussions on agenda items.
  - Board members appear to be familiar with the policies, have read them, and follow them.
  - The board has been provided with CSBA training on its role in policymaking and how to function within a policy framework.
  - Advisory board members appear to understand their expected roles as representatives of the entire district operating within the framework of the policies and no longer perceive themselves simply as members of the community or individuals.
4. The exhibit to Board Bylaw 9270 states "Board of Education members and designated employees shall file a Statement of Economic Interest/Form 700 in accordance with the disclosure categories listed in the attached appendix." The exhibit Board Bylaw 9270 was



revised February 27, 2020, and last reviewed on February 27, 2022, and “Board Members” was added to the list of positions designated to submit conflict of interest forms.

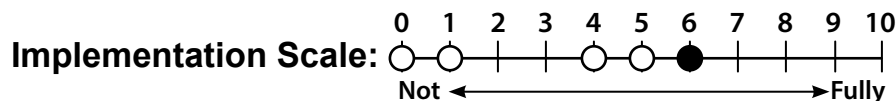
5. The district provided FCMAT with copies of the signed forms for all advisory board members during this review period, as well as a tracking sheet showing when the advisory board members, cabinet, and other administrators submitted their forms.

## Recommendations for Recovery

1. All advisory board members, staff members and the county administrator should adhere to and be accountable for board policies and administrative regulations.
2. The county administrator should continue to guide and assist advisory board members with their understanding of appropriate perspective in their role as members and appropriate behavior according to policies, ethics, and procedures.
3. All advisory board members should continue to comply with the Fair Political Practices Commission Form 700 filing requirements.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 5.1 Board Roles/Boardsmanship

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### Legal Standard

Each board member meets the eligibility requirements to be a board member. (EC 35107)

### Findings

1. Board Bylaw 9223, revised September 19, 2018, requires board members to meet the following criteria to be eligible for the position pursuant to EC 35107:
  - Be 18 years of age or older
  - Be a citizen of the state
  - Be a resident of the school district
  - Be a registered voter
2. The county administrator is not responsible for screening candidates to ensure they meet the eligibility requirements of running for office or serving as advisory board members. The county administrator relies on the local government and election board to perform these tasks.
3. During the 2017 review, FCMAT determined that neither the local government nor the election board provide verification that the advisory board members meet all standards of eligibility. The district and the FCMAT study team determined that, as an alternative, the district would annually obtain statements signed under penalty of perjury from each of its advisory board members stating that he or she is a citizen of California, a resident of the city of Inglewood, and a registered voter.
4. Based on the statements completed and executed by advisory board members during this review and interviews held, FCMAT determined that all advisory board members appear to meet all four criteria.

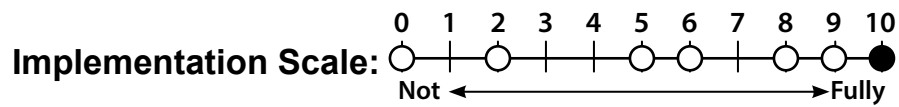
### Recommendation for Recovery

1. Self-certification should continue to be renewed annually, as circumstances may change from year-to-year, to ensure that all existing and future advisory board members meet the Education Code requirements to serve as members of the board. This process should be formalized through a district policy or administrative regulation.



## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	10





## 5.2 Board Roles/Boardsmanship

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### Professional Standard

Board members receive necessary training to better fulfill their roles.

### Findings

1. Board Bylaws 9230 and 9240, updated on September 19, 2018, reflect the district's desire to provide the advisory board with orientation and ongoing training and places the responsibility to do so on the superintendent.

The two long-serving advisory board members completed the CSBA Masters in Governance program in 2016. Since the 2019 review, three new advisory board members have joined the board. At the time of the 2021 review, all three had registered for the Masters in Governance program and had either just had their first session or were scheduled to do so that week. The county administrator had also registered for the training. All three new advisory board members and the county administrator completed the program in May 2021.

2. The Masters in Governance program includes courses in the following subjects:
  - Foundations of effective governance/setting direction
  - Student learning and achievement/policy and judicial review
  - School finance
  - Collective bargaining/human resources
  - Community relations and advocacy/governance integration
3. In addition, the district continues to provide training/workshops to advisory board members on other topics pertinent to their roles and responsibilities (e.g., Brown Act, governance norms and protocols, effective communication, etc.) and other areas they deem important. Advisory board members are also attending conferences and other trainings offered by professional organizations, such as CSBA and California Association of Black School Educators.
4. A schedule has been developed and posted on the district's website and provided to FCMAT for the 2022 calendar year for regular board meetings/board workshops. The meetings/workshops are open to the public and attended by advisory board members.

### Recommendations for Recovery

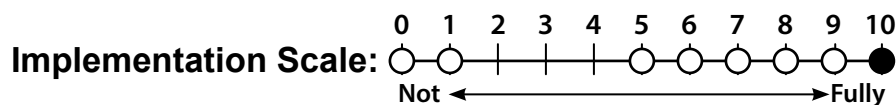
1. The county administrator should continue to provide training opportunities to the advisory board to ensure members fully understand their roles and responsibilities and stay abreast of best practices and updates in law. The training should be a full-year/ongoing process.



2. Laws, regulations, and practices with regards to education are constantly changing. Some changes are minor, while others have long-reaching consequences. For example, in 2013, the legislature adopted a new funding model for K-12 education that was the most significant change in school finance in more than 40 years. While advisory board members have completed Masters in Governance training, the district should require that board members seek continuing education, or possibly renew their certification at either specified intervals or when major changes have occurred within one of the five subject areas, to ensure they stay current.

## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	10





## 5.3 Board Roles/Boardsmanship

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### Professional Standard

The board has established an LEA-wide vision/mission and uses that vision/mission as a framework for LEA action based on the identified needs of the students, staff, and educational community.

### Findings

1. Board policies were updated in September 2018 to reflect the district's philosophy, goals, and objectives (BP 0100-Philosophy, BP 0200-Goals for the School District, and BP 0400-Comprehensive Plans).
2. The Five-Year Strategic Plan (2018-2023) was officially launched in August 2018 at the district's all staff meeting and adopted on November 7, 2018. The Strategic Plan is a comprehensive document that discusses the state of the district, lays out the mission, equity principle, and core beliefs, along with the goals and measurements for student progress. It also discusses the plan's implementation strategy and sets annual performance objectives to meet its goals. Development of the plan included the community engagement, as well as board member workshops. The document was developed to ensure alignment with the FCMAT annual review process as well as the AB 1840 and county office requirements.
3. The district's Mission and Equity Principle are as follows:

#### Mission

Our mission is to nurture, educate, and graduate students who are self-responsible and self-disciplined; who are critical and creative thinkers; who master the core academic disciplines; and who are advocates for equity and social justice for self and their community.

#### Equity Principle

At every point along their educational journey, each student will be provided personalized opportunities and equitable resources for consistent academic and social-emotional growth, steady progress toward high school completion, and readiness for post-secondary experiences of their choosing.

4. Posters have been printed and posted in the district offices and at school sites, and use of the plan was incorporated in the district's operations. The mission, equity principle, and core beliefs can also be found on the district's website.
5. As noted in Standard 1.2, while the county administrator is honoring the work and community input that went into the creation of the Strategic Plan, it is used as a starting point in defining specific and measurable next steps. In this way, the county administrator



believes that the vision of the Strategic Plan can be better leveraged and made more tangible and actionable. For example, FCMAT was provided with a presentation dated April 21, 2021, titled “Strategic Plan, Instructional Priorities, & Equity Indicators Alignment” that appears to create a crosswalk between the Strategic Plan goals and Educational Services instructional priorities and metrics.

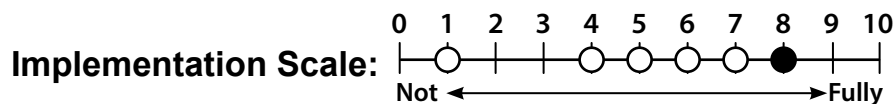
6. At its December 7, 2019, Governance Retreat, the advisory board developed a governance team vision: to provide transformational leadership so that the Inglewood Unified School District thrives. FCMAT noted during the last in-person review (2019) that this board vision and other board protocols were posted at the dais as a visual and constant reminder for the advisory board members of their mission.

## Recommendation for Recovery

1. The county administrator should continue to ensure that staff and the community are aware of the connection between the administration’s current direction and action plans and the Strategic Plan. The connection between the Strategic Plan and the IUSD Progress Report should also be clearly made so that its role as a metric is understood.

## Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 5.5 Board Roles/Boardsmanship

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### Professional Standard

Board members maintain functional working relationships. Individual board members respect the decisions of the board majority and support the board's actions in public.

### Findings

1. As noted in earlier standards, advisory members regularly attend board meetings and appear engaged and attentive. However, during the 2019 review, FCMAT noticed that during special events (such as community presentations) that occurred during board meetings, board members were not present throughout the entire board meeting. Instead, they entered and exited during the meeting in preparation of the special event to be held later. This was not evidenced either during the March 10, 2021, nor March 9, 2022, board meetings that FCMAT attended, indicating the issue has been addressed.
2. While the advisory board makes no decisions, the county administrator provides members with the opportunity to comment and ask questions before acting on agenda items in addition to the time allotted at the end of each meeting for comments. Although they are attentive, board member comments and questions are minimal. Based on interviews with board members, this is mainly because they have ample opportunity to ask questions of staff and have their questions/concerns addressed prior to the board meeting. The county administrator continues to support the established board subcommittees (e.g., budget and board policy) in which the members are actively engaged.
3. Based on FCMAT's attendance at and observation of the March 9, 2022, regular board meeting, as well as interviews with the advisory board members and district staff, the advisory board members continue to maintain functional working relationships with each other and staff members. The advisory board members respect the decisions made by the county administrator and ask questions and voice their concerns in a professional manner. This is also true of the most recently seated board members who appear to be following existing protocols and processes. They are building on the strong relationship developed by the existing board members and the administration.
4. Interviewees noted that advisory board members collaborate to bring about change or provide information to the public (e.g., continued growth and stability of the Inglewood Educational Foundation and involvement in other local organizations and committees), although this has been less so over the last two years given the pandemic. However, staff members interviewed still contend this is the best board that the district has had in some time and are complimentary of the relationships they maintain.
5. The advisory board members are developing a cohesive and efficient working relationship that allows for collaboration, even with the new members. During the 2019 review, interviews indicated advisory board members, constituting a majority, met and discussed



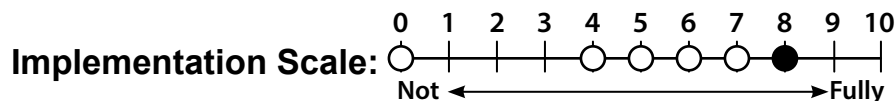
items of district business outside of public meetings. While this was not a concern raised during the last or this year's reviews, members should always conduct themselves as if they are subject to the same laws regarding public meetings as typical school board members.

## Recommendations for Recovery

1. Advisory board members should continue being present throughout the entire board meeting and avoid entering and exiting throughout the meeting.
2. The county administrator should continue to foster a functional working relationship among the advisory board members as well as provide guidance and training on appropriate board etiquette and procedures.
3. The county administrator should continue to allow the advisory board members to provide input on board agenda items when each item is heard.
4. The county administrator should continue to work with the advisory board members to develop sustainable lines of communication and working styles that can be carried forward once local control is returned.
5. Advisory board members should continue to conduct themselves as if they are subject to the same laws regarding public meetings as typical school board members.

## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 5.6 Board Roles/Boardsmanship

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### Professional Standard

The board and administrative team maintain functional working relationships.

### Findings

1. The county administrator and administrative team continue to reinforce the established functional working relationships with the advisory board members. Advisory board members interviewed discussed staff's willingness to assist and provide information as needed, while administrative staff interviewed noted the congenial and professional communication with and among the advisory board members.
2. As noted in the previous standards, FCMAT attended a regular board meeting on March 9, 2022 and noted that interactions between the advisory board members, administrative staff, and the county administrator continued to be respectful and professional and displayed a functional working relationship.
3. The county administrator continues to provide a written recap to the advisory board every Friday covering major topics, events, and decisions from the preceding week. Advisory board members interviewed expressed their appreciation of these updates as well as the county administrator's willingness to regularly meet with them and answer questions and address concerns.
4. The county administrator has continued the practice of having all questions and concerns from the advisory board members filtered through the county administrator instead of given directly to others on the administrative team. In this way, one consistent channel of communication has been established between the advisory board and district staff. However, board members noted that the administrative team is accessible.
5. The county administrator has continued holding meetings with each advisory board member prior to board meetings to review board agendas and receive input on board items. While most meetings include all cabinet members, allowing the advisory board members to ask questions directly of each department depending on the agenda item, a few advisory board members indicate that the meetings now only include cabinet members as needed. Before meetings, board members ask any questions they have, and cabinet members are invited if needed to address questions or concerns. This provides for a more efficient use of cabinet members' time, although it limits board member accessibility to staff, which could affect the ability to foster a strong working relationship between the broader district administrative team and the advisory board. In addition, the prior focus on creating an organizational structure that includes a strong board president that leads the advisory board, resulting in the county administrator working more closely and meeting more regularly with the board president to develop and review agendas and discuss other district matters, appears to have been discontinued.



6. Similar to the 2021 review period, the district provided a governance calendar for 2022 that details the work undertaken by the advisory board, assigns district staff and board members to various tasks and committees, notes when the item will be completed, and other details. Staff noted that the calendar was developed collaboratively between the administration and the advisory board. Some concern was expressed about the advisory board members' roles on certain committees and whether they are truly integrated or simply there to observe and report back to the rest of the governing board.

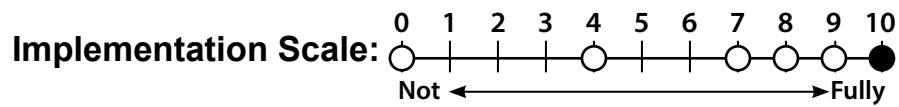
## **Recommendations for Recovery**

1. The county administrator should continue to foster a functional working relationship between the advisory board and administrative staff while continuing the practice of being the conduit of information to and from district staff.
2. The county administrator should continue to provide training to the advisory board to help members understand the appropriate roles in their relationships with each other and their functional working associations with administrative staff.
3. The county administrator should continue to provide the advisory board members with opportunities to engage in routine board actions to further provide experience before their eventual resumption of authority.
4. The administration should continue to inform and engage the advisory board on discussions held and decisions made to ensure the continued support of the advisory board and further develop the established relationship between the administration and the advisory board.
5. Advisory board member committee assignments should be clarified for each respective committee to either allow the board member to be an active participant of the committee or attend for informational purposes. In this position, the board member(s) can learn and ensure that the district and other governing board members are kept abreast of the impacts of decisions made by the committees or organizations.



## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	4
July 2017 Rating:	7
July 2018 Rating:	8
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## **5.9 Board Roles/Boardsmanship**

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### **Professional Standard**

Board members respect the confidentiality of information shared by the administration.

### **Findings**

1. The county administrator includes the advisory board in all closed sessions and requires each advisory board member to sign a confidentiality declaration agreeing that any information discussed in closed session would not be disclosed outside. FCMAT was provided with an updated statement signed by all advisory board members during this visit, as the district has made this an annual process.
2. Training on the Brown Act as well as on roles and responsibilities was provided to advisory board members at a board workshop meeting on October 27, 2021, by the district's legal counsel.
3. Based on interviews, it appears that advisory board members have been appropriately counseled about confidentiality and respect the confidentiality of information provided by the administration.

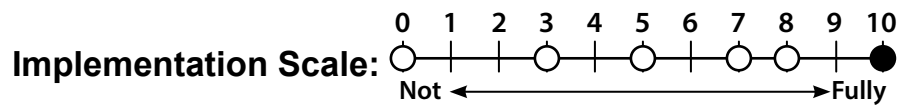
### **Recommendations for Recovery**

1. The county administrator should ensure that advisory board members continue to receive training on their roles and responsibilities regarding matters heard in closed session, such as negotiations and personnel issues, as well as properly handling confidential information. The training should include reinforcement of Brown Act requirements and responsibilities pertaining to reporting Brown Act violations.
2. The county administrator should continue including the advisory board in closed session and providing members the opportunity to ask questions and comment similar to open session. This will provide the advisory board with insight into district operations to build capacity.
3. The execution of the confidentiality declaration should continue to be completed annually as a best practice.



## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	3
July 2018 Rating:	5
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	10





## 5.10 Board Roles/Boardsmanship

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### Professional Standard

Board members effectively develop policy and set the direction of the LEA while supporting the superintendent and administrative staff in their responsibility to implement adopted policies and administrative regulations.

### Findings

1. CSBA releases policy revisions throughout the year. According to its website, CSBA releases updates five times per year, one each in July, October, December, March, and May, with each release including numerous policy revisions. However, a review of the district's website and the board policies adopted show that some policies have not been updated, and some are still dated as far back as October 2012. The district has not provided an explanation or information, such as a schedule, as to why some policies have not been updated.
2. During the last review, the senior clerk, county administrator's office was designated to lead the effort on updating policies. The district is moving to revise the policies as updates are provided by CSBA. The point person receives the updates from CSBA and shares pertinent information with the cabinet, who then reviews the policies and makes the necessary revisions. The revisions are then reviewed by the Board Policy Committee, which includes board members, for their input and recommendations before the revisions are sent to legal counsel for review. The policies are provided to the county administrator for review and placed on the board agenda for approval. A log has been developed that tracks the policies that have been updated since December 2019, whether it is a change due to a CSBA update, who is responsible for updating the policy, and the date that each step in the process is completed. The last updates, per the Board Policy and Administrative Regulation Working Distribution Log, occurred in August 2021. GAMUT now has the functionality to allow the district to update its policies, which should eliminate the delay between approval and posting online. However, all board policies revisions, as reflected in the Index Board Policies and Administrative Regulation Master Log provided to FCMAT, have yet to be updated in GAMUT and reflected on the website.
3. Board policies are available to anyone having internet access via a link on the district's website. As part of the update process, a memo is sent to all district staff noting any new or amended policies and administrative regulations. The first memo noted policies and regulations approved at the November 2019 board meeting and enclosed the revised documents as they were not yet available on GAMUT. Additional memos have been provided for other updates since November 2019 illustrating the district's continued practice of disseminating updated policies more broadly, via email, to all staff.
4. With the establishment of this new review process and the use of the Board Policy Committee, the advisory board members have had a more direct role in developing policies and regulations. This has been a step in fulfilling their roles and supporting the county administrator and administrative staff in their responsibility to implement adopted policies and administrative regulations.

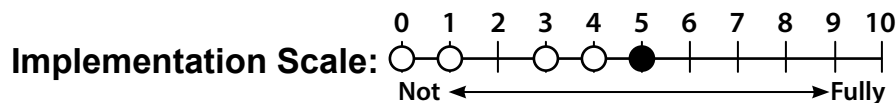


## Recommendations for Recovery

1. The county administrator should continue proactively involving the advisory board in updating board policies to reflect current law and district practices. The new process should be codified in a written procedure to ensure it continues in the absence of the currently assigned point person.
2. The county administrator should ensure that all relevant updates from CSBA are disseminated, reviewed, and adopted on a timely basis so policies remain current through the GAMUT program.
3. The county administrator should continue to work closely with staff and administrators to disseminate, communicate, and implement the board policies throughout the district.
4. All board policies revisions should be updated in GAMUT and reflected on the website.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	0
July 2018 Rating:	3
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 5.11 Board Roles/Boardsmanship

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### Professional Standard

The board acts for the community and in the interests of all students in the LEA.

### Findings

1. FCMAT attended the board's March 9, 2022, meeting and observed that advisory board members are still provided with the opportunity to ask questions or comment on agenda items. Each advisory board member also can comment on items not on the agenda at the end of the board meeting.
2. Based on attendance at this meeting, a review of prior board meeting minutes, and interviews with district staff, the advisory board members appear to act for the community and in the interests of all district students.
3. As previously noted, the advisory board attends community and district events and initiates gatherings to stay connected to the community and students.
4. In addition, advisory board members continue to be appointed to various committees, sub-committees, and other local organizations (e.g., Citizens' Bond Oversight Committee, Child Development Center Parent Collaborative Committee, Communications and Engagement Committee, Budget Advisory Committee, etc.) that will further develop the relationships between the advisory board/district and the community in furtherance of the students' interests.

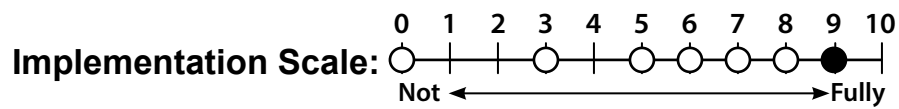
### Recommendations for Recovery

1. The county administrator should continue to encourage and support advisory board members in their efforts to engage with the community and continue to be open and available for input on matters of importance to the community and students.
2. The county administrator should continue to provide training to the advisory board on their roles and responsibilities in advising the county administrator on efforts to provide the best education possible for all students.



## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	9





## 6.6 Board Meetings

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### Professional Standard

Board members prepare for board meetings by becoming familiar with the agenda and support materials prior to the meeting.

### Findings

1. The Brown Act (Government Code Section [GC Section] 54950 et seq.) requires that at least 72 hours before a regular meeting, the governing board of a school district post an agenda for the meeting. In addition, EC 35144 requires that at least 24 hours before a special board meeting, the governing board be notified and the notice posted. Further, Board Bylaw 9320, states the following:

Whenever agenda materials relating to an open session of a regular meeting are distributed to the Board less than 72 hours before the meeting, the Superintendent or designee shall make the materials available for public inspection at a public office or location designated for that purpose.

2. During reviews prior to 2021, the board meeting agendas were provided to the advisory board members on the Friday before the meeting (e.g., for the March 6, 2019, meeting, an email was sent to the advisory board on Friday, March 1, 2019). However, this practice changed during the 2021 review, when notification emails for regular board meetings were usually delivered to advisory board members on Sundays. FCMAT had also found one notification that was sent only 48 hours in advance of the meeting. Notifications were provided to advisory board members in a time frame that was consistent with the letter of the law as it does not specify 72 business hours nor does it require board member notification for regular board meetings, but simply that agendas be posted at least 72 hours in advance. However, the Sunday notification should be discouraged. The district's board agendas ranged between three and 58 pages, excluding attachments, and averaged 29 pages over the review period. Attachments can add hundreds of pages, such as a November 4, 2020 agenda that was selected at random. Its agenda was 26 pages in length, but attachments totaled more than 230 pages. Board members frequently have regular jobs that take up most of their week; providing them board materials on a Sunday may not allow them sufficient time to review and prepare. For special board meetings, email notifications were provided the day prior, but not always 24 hours in advance. For example, one notification was sent at 6:49 p.m. on a Monday for a 5 p.m. special board meeting on Tuesday. (This also happened occasionally for regular board meetings.)

A review of the notifications sent during this review period shows that the district continues to send the notifications to board members the Sunday before the Wednesday board meeting, with one exception, although FCMAT does acknowledge that the advisory board members are provided with advance notification of agenda items to provide the opportunity to meet with the county administrator to address questions.



3. The advisory board appears to review the documents in advance based on FCMAT's observations, the questions asked by the advisory board members at the March 9, 2022, board meeting, and interviews with advisory board members.
4. Board Bylaw 9320 specifies that regular meetings are to be held once each month and additional regular meetings may be scheduled as needed on Wednesday evenings at 5 p.m. The Board Bylaw also specifies that workshops, study sessions and special meetings may be scheduled as needed to help advance district priorities. A review of board meeting times during this review period shows that regular board meetings have been consistently held at 5 p.m., with some including closed sessions that begin at 4 p.m. In addition, future board meeting dates and times have been scheduled and are listed on the district's website. While all board meetings during this review, except for the special board meeting, were held on Wednesdays, the given Wednesday has differed. Since March 2021, the board meeting was held on the first Wednesday of the month twice; the second Wednesday five times; the third Wednesday four times; the fourth Wednesday six times, and a fifth Wednesday once.
5. According to interviews with advisory board members and district administration, the county administrator is available to address advisory board member questions and concerns before board meetings. One-on-one meetings are scheduled in advance between each advisory board member and the county administrator, with executive cabinet included as needed, to discuss the agenda prior to board meetings. As previously noted, advisory board members are also provided with the opportunity to comment and ask questions at each board meeting before the county administrator acts on items.

## **Recommendations for Recovery**

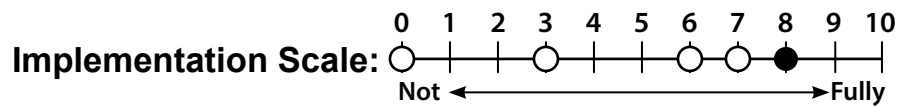
1. The county administrator should continue to provide advisory board members with as much notice of meetings as possible by distributing agendas and supporting materials for regular board meetings at least 72 hours in advance (GC Section 54954.2) to provide an opportunity to answer questions or make clarifications. Providing and posting the agenda the Friday before a Wednesday board meeting, for example, should be considered a best practice. Hard copies should be provided to advisory board members who request them.
2. The advisory board members should continue to review board packets in advance of each meeting and discuss their questions and concerns with the county administrator before each meeting.
3. The county administrator should continue the practice of reducing the number of special board meetings held (except for those held for the purpose of providing training to the advisory board), holding board meetings on a consistent day, week(s) (e.g., 1<sup>st</sup> and 3<sup>rd</sup> Wednesdays of the month), and time, and announcing proposed board meeting dates in advance. A consistent day, week(s), and time and a posted calendar of future meetings provide the public with a greater opportunity to attend the board meetings and make for a more open and transparent governance process.



4. The county administrator should continue meeting one-on-one with advisory board members to help them better understand district operations, decisions, and the district's status.

## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	3
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	8





## 6.9 Board Meetings

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### Professional Standard

Board meetings focus on matters related to student achievement.

### Findings

1. A review of the board meeting agendas and minutes provided to FCMAT indicates that while board meeting agendas continue to focus on transactional administrative matters, the district is incorporating matters related to student achievement. For example, the board received a presentation on assessment data and an update on the Gifted and Talented Education (GATE) program, as well as a report on the alignment of the district's Strategic Plan, student learning, and achievement goals. As in past years, other matters relating to student achievement continue to be heard and discussed (e.g., approval of the Local Control and Accountability Plans for the district and its district-operated charter schools, textbook adoption, etc.). In addition, time continues to be allotted at each board meeting for reports from students on events and news at their sites.
2. FCMAT observed the district's March 9, 2022, board meeting and noted that it has continued the practice of honoring parents, staff, and students at board meetings. The district also provided a schedule showing which schools would be honored and other recognitions at each board meeting.
3. District staff provide periodic presentations on academic matters. For example, at the January 12, 2022, board meeting, the advisory board heard a presentation on the EL Master Plan, and at the January 26, 2022, board meeting, a presentation was provided on the School Accountability Report Cards.

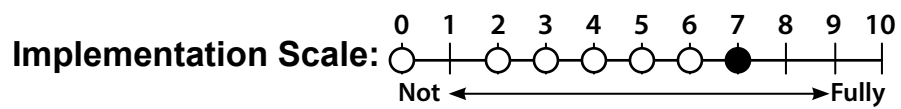
### Recommendation for Recovery

1. The district should continue to provide regular presentations to the advisory board on academic matters as information and updates are warranted for major developments. In addition, the county administrator should resume having the school administration provide monthly reports as informational items. Regular reports should also continue to be provided on the academic progress and achievements of the district (e.g., student achievement and progress, curriculum and instruction, professional development, data and its uses, and other topics). This will further inform the advisory board, staff, and community about the district's academic status and progress as well as the programs offered or considered.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7









# **Table of Community Relations and Governance Ratings**







Community Relations and Governance Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.1	PROFESSIONAL STANDARD – COMMUNICATIONS The LEA has developed a comprehensive plan for internal and external communications, including media relations.	1	1	2	2	4	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
1.2	PROFESSIONAL STANDARD – COMMUNICATIONS Information is communicated to the staff at all levels in an effective and timely manner. Two-way communication between staff and administration regarding the LEA's operations is encouraged.	1	0	3	4	6	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
1.4	PROFESSIONAL STANDARD – COMMUNICATIONS Individuals not authorized to speak on behalf of the LEA refrain from making public comments on board decisions and the LEA's programs.	1	0	1	2	5	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
2.3	LEGAL STANDARD – PARENT/ COMMUNITY RELATIONS The LEA has developed and annually disseminates uniform complaint procedures. (Title 5, Section 4621, 4622)	3	1	6	6	6	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
2.4	LEGAL STANDARD – PARENT/ COMMUNITY RELATIONS Parents and community members are encouraged to be involved in school activities and in their children's education.	3	2	5	5	6	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7



Community Relations and Governance Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
2.8	<p>PROFESSIONAL STANDARD – PARENT/ COMMUNITY RELATIONS</p> <p>Board members are actively involved in building community relations.</p>	1	1	1	4	6	6	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	9
3.1	<p>LEGAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</p> <p>Policies exist for the establishment of school site councils. The school site council develops a single plan for student achievement at each school, applying for categorical programs through the consolidated application. (EC 52852.5, 64001)</p>	3	2	5	5	6	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	6
3.4	<p>PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</p> <p>The board and superintendent have established broad-based committees and councils to advise the LEA on critical issues and operations as appropriate. The membership of these committees and councils reflects the full cultural, ethnic, gender and socioeconomic diversity of the student population.</p>	0	0	2	2	2	2	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	5



Community Relations and Governance Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.6	<b>PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</b> The LEA encourages and provides the necessary training for collaborative and advisory council members to effectively fulfill their responsibilities and to understand the basic administrative structure, program processes and goals of all LEA partners.	0	1	1	4	4	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
4.5	<b>PROFESSIONAL STANDARD – POLICY</b> The board supports and follows its own policies once they are adopted.	1	0	0	4	4	5	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
5.1	<b>LEGAL STANDARD – BOARD ROLES/ BOARDSMANSHIP</b> Each board member meets the eligibility requirements to be a board member. (EC 35107)	2	0	0	5	6	6	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	10
5.2	<b>PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP</b> Board members receive necessary training to better fulfill their roles.	0	0	1	5	6	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	10



Community Relations and Governance Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.3	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board has established an LEA-wide vision/ mission and uses that vision/mission as a framework for LEA action based on the identified needs of the students, staff, and educational community.	1	1	1	4	6	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
5.5	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members maintain functional working relationships. Individual board members respect the decisions of the board majority and support the board's actions in public.	0	0	0	4	6	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
5.6	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board and administrative team maintain functional working relationships.	0	0	0	4	7	8	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
5.9	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members respect the confidentiality of information shared by the administration.	0	0	0	0	3	5	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	10



Community Relations and Governance Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.10	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members effectively develop policy and set the direction of the LEA while supporting the superintendent and administrative staff in their responsibility to implement adopted policies and administrative regulations.	1	0	0	0	0	3	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
5.11	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board acts for the community and in the interests of all students in the LEA.	0	0	0	3	5	6	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	9
6.6	PROFESSIONAL STANDARD – BOARD MEETINGS Board members prepare for board meetings by becoming familiar with the agenda and support materials prior to the meeting.	0	0	0	3	6	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	8
6.9	PROFESSIONAL STANDARD – BOARD MEETINGS Board meetings focus on matters related to student achievement.	2	0	0	2	3	4	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7
<b>Collective Average Rating</b>		<b>1.05</b>	<b>.45</b>	<b>1.40</b>	<b>3.78</b>	<b>4.85</b>	<b>5.50</b>	<b>6.20</b>	<b>—</b>	<b>7.05</b>	<b>7.80</b>







# Personnel Management







## 1.1 Organization and Planning

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### Professional Standard

The local educational agency (LEA) has clearly defined and clarified roles for board and administration relative to recruitment, hiring, evaluation and discipline of employees.

### Findings

1. The county administrator continued to send correspondence to all district staff regarding board policy updates during this review period. Staff interviews indicate that a newly created position of director of employee relations and policy management, which is assigned in the HR Department organizational chart, is responsible for monitoring and updating board policies. The director of employee relations and policy management assumed that role in January 2022 and is the position responsible for board policy review.

A small number of the 4000 series administrative regulations on personnel were updated to CSBA's template and adopted during board meetings with dates noted below. Policy updates are provided by CSBA five times per year (July, October, December, March, and May).

- Administrative Regulation (AR) 4030-Nondiscrimination in Employment-(June 30, 2021 board meeting)
  - AR 4119.11/4219.11/4319.11-Sexual Harassment-(June 30, 2021 board meeting)
2. Board Bylaw 9000-Role of the Board indicates that the board will hire and evaluate the superintendent and establish policies for the hiring and evaluation of other personnel. Board Bylaw 9000 also provides that the board will set parameters for negotiations with employee organizations and ratify collective bargaining agreements.
  3. BP 4000-Concepts and Roles provides that the district will attract and retain highly qualified staff. BPs 4111/4211/4311-Recruitment and Selection also provide that the superintendent or designee will develop fair, open, and transparent recruitment and selection processes and procedures that ensure employees are selected based on demonstrated knowledge, skills, and competence and not on any bias, personal preference, or unlawful discrimination.

For each position, the superintendent or designee shall present to the Board one candidate who meets all qualifications established by law and the Board for the position. No person shall be employed by the board without the recommendation or endorsement of the superintendent or designee.

4. BPs 4111/4211/4311 have been updated during the April 2019 board meeting, based on the March 2018 information provided from CSBA, as of the date of FCMAT's fieldwork.



5. BP 4030-Nondiscrimination in Employment prohibits discrimination against job applicants and district employees based on protected characteristics such as age, gender, gender identity, religious creed or dress, marital status, or sexual orientation.
6. BPs 4115/4215-Evaluation/Supervision provides the criteria to evaluate certificated and classified employees. The superintendent or designee is to ensure that evaluation ratings have uniform meaning throughout the district. Evaluations are to be used to recognize exemplary skills and accomplishments or to identify areas needing improvement.
7. BP 4315-Evaluation/Supervision provides the criteria for evaluating administrative staff. The evaluation is linked to the district's vision and goals and school improvement plans along with referencing evaluation criteria based on the California Professional Standards for Education Leaders (CSPEL).
8. The board's policies on suspension/disciplinary action of certificated employees are contained in BP 4118 and provide that the superintendent or designee shall ensure that, consistent with the law, disciplinary actions are taken in a consistent, nondiscriminatory manner and are appropriately documented. There is no current board policy for the suspension/disciplinary action of classified employees.
9. BP/AR 4300.11-Governing Board/Administrators/Confidentials Working Relations were adopted on June 29, 2015, the board policy was updated on January 11, 2017 and the administrative regulation was updated April 17, 2019. These policies stipulate the rights and personnel practices related to certificated and classified administrators and confidential employees. In implementing this policy and regulation, the district no longer provides certificated administrators with vacation days and moved all certificated administrators to a positive work calendar.
10. The district has developed and implemented selection procedures that ensure nondiscrimination in hiring and has provided training to hiring managers (see also Standard 3.11).

Review of the district website indicates that most personnel policies were last updated in 2014. The policies adopted in 2014 are accessible via the district website and interspersed with the updated 2019 and 2020 policies. Many of these policies are duplicative, but are referenced with different policy numbers to address different classes of employees—certificated (4100s), classified (4200s) and management (4300s). In addition, some of the BPs have been updated, yet the applicable ARs have not. In some cases, ARs have been updated, and the accompanying BP has not. Examples of these issues are as follows:

BP has been updated, but the AR has not:

- |           |                            |
|-----------|----------------------------|
| • BP 4040 | Employee Use of Technology |
| • BP 4113 | Assignment                 |
| • BP 4131 | Staff Development          |



- BP 4143.1 Public Notice – Personnel Negotiations
- BP 4200 Classified Personnel
- BP 4219.42 Exposure Control Plan for Blood-Borne Pathogens
- BP 4243.1 Public Notice – Personnel Negotiations

AR has been updated, but the BP has not:

- AR 4112.42/4312.42 Drug and Alcohol Testing for School Bus Drivers
- AR 4112.61/4212.61 Employment References
- AR 4157.1 Work-Related Injuries
- AR 4222 Teacher Aides/Paraprofessionals
- AR 4257.1/4357.1 Work-Related Injuries
- AR 4300.1 Governing Board/Administrators/  
Confidentials Working Relations
- AR 4312.61 Employment References

Most board policies and administrative regulations were adopted and/or reviewed in 2014, with 158 listed on the district website with a review date in 2014. The second highest group of 104 were reviewed in 2019, with one update in 2017 and five policies updated in 2020. These numbers reflect the district's slow progression in its efforts to maintain updated, legally compliant policies.

## Recommendations for Recovery

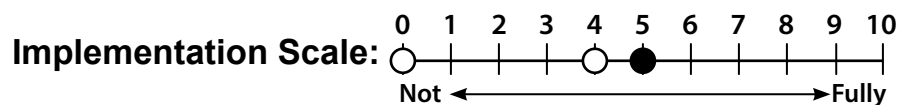
1. The district should continue to subscribe to CSBA's policy manual and online policy maintenance services. These services allow the district to update its policy manual as laws affecting schools change. It will also continue to allow public access to the district's policy manual. However, the district must update its policy manual as updates are sent by CSBA. The HR Department, specifically the director of employee relations and policy management should schedule the backlog of board policies and administrative regulations that need updating and board approval including those going back to 2014. Even though updating board policies and administrative regulations are included in the HR annual calendar, the timeline shows this as ongoing, when it should be scheduled in July, October, December, March and May, to coincide with the CSBA release dates which will help the department stay on task with policy updates.
2. The district should regularly update its board policies to reflect current laws and requirements.



3. The district should continue to ensure that board policies and administrative regulations on recruitment and selection are updated to ensure compliance with law related to nondiscrimination in employment.
4. The district should ensure that hiring managers are accountable to the consistent implementation of nondiscrimination policies and regulations.
5. Key processes identified as board policy, must be closely aligned with administrative regulation to ensure that the enforcement of district policy and procedures are implemented. Board policy and the corresponding administrative regulation should be updated concurrently to ensure that district procedures align with policy.
6. In the interest of ensuring that the appropriate and most recent policies are accessible to those affected, and personnel policy is clearly communicated to employees, outdated policies from 2014 should be regularly updated and the duplicates removed from the district website to avoid confusion. The district should continue to send correspondence to all district staff regarding board policy updates.

## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 1.2 Organization and Planning

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### Professional Standard

The personnel function has developed a mission statement and objectives directly related to the LEA's goals and provides an annual report of activities and services offered during the year.

### Findings

1. The district's mission is "to nurture, educate, and graduate students who are self-responsible and self-disciplined; who are critical and creative thinkers; who master the core academic disciplines; and who are advocates for equity and social justice for self and their community."

2. The HR Department mission is as follows:

In support of the Inglewood Unified School District's principles, values, vision, and mission, it is the mission of the Human Resources Department to support the total operation in meeting its goals through its most valuable resource-its PEOPLE. Human Resources is dedicated to promoting, through personalized customer service, the recruitment, selection and retention of highly qualified employees who will effectively serve and meet the needs of our students and the community at large.

3. The department's vision is "to provide the employee related resources necessary to fulfill the vision of the Inglewood Unified School District to the students, employees and community by demonstrating core values that include:

- Accountability
- Integrity
- Respect
- Responsiveness
- Collaboration
- Life Long Learning

All geared toward student success and the overall empowerment of district employees."

4. The department's mission and vision statements were provided to FCMAT and were easy to access on the district website under the HR staff webpage.
5. Interviews with HR staff indicate that the department meets every other week and discusses a variety of topics, including personal and department goals.



6. There was no evidence that indicated that the department developed and is implementing a work plan designed to facilitate the implementation of the department goals.
7. Consistent with the prior review period, the Human Resources Division 2020-21 Annual Report was presented to the board during a regularly scheduled meeting held on November 3, 2021. During the presentation, the HR Department shared the 2021-2022 Priorities and Goals:
  - Recruitment and retention of quality employees
  - Establish, optimize, communicate and follow clear procedures and protocols with a focus on position control and staff evaluations
  - Provide HR staff with the time, guidance and support needed to develop professionally
8. The HR Department's goals were clearly stated during the presentation, and as described above, the goals were descriptive and narrowly focused on areas that will positively affect all staff: recruitment, retention, position control, staff evaluations, and building professional capacity in HR staff through professional support and training. Department goals are specific and list intentional actions to reach department objectives. The items above reflect progress in meeting this definition; however, documentation reviewed by FCMAT did not indicate that department meetings or activities were held to assist the department in reaching the goals described in the annual report.

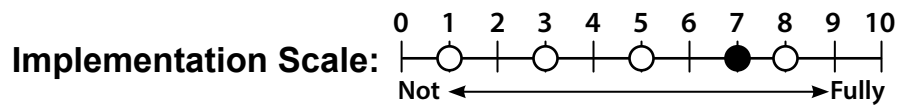
## **Recommendations for Recovery**

1. The district should continue to review the department's vision and mission statements annually and ensure that they keep pace with changes in district initiatives and continue to support the district's recovery plan. The mission and vision statements should continue to be clearly and completely stated on the HR Department's webpage.
2. The district should continue to ensure that the HR Department annually develops measurable goals and objectives that facilitate its mission. The department should also develop a work plan that includes actionable items and measurable progress in implementation of department goals.
3. The annual report to the board provides valuable information and data, and the district should continue to ensure that it is updated and presented annually.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	7
July 2022 Rating:	7





## 1.3 Organization and Planning

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### Professional Standard

The personnel function has an organizational chart, functions chart, and a menu of services that include the names, positions and job functions of all personnel staff.

### Findings

1. The HR Department organizational chart provided reflects most of the department's positions and includes the names of the individuals assigned to each position; however, project coordinators were not included. Staff interviews indicated that the project coordinator positions are temporary and are assigned duties related to COVID-19 safety regulations, and other general HR tasks. The lines on the organizational chart indicate functional relationships and the supervisory chain of command. The HR Department's organizational chart is not included on the staff directory page. The HR webpage includes a Human Resources Directory, which includes contact information for HR staff, but it does not illustrate the reporting structure within the department. The general position title does not provide information regarding the role of the position in the HR Department.
2. The department website has a menu of services that provides information to visitors on whom to call with specific questions, and the menu is located close to the department staff listing.
3. The HR Department's online resources are user-friendly and easy to find from the district's home page by clicking Departments & Services then choosing Human Resources. Visitors to the website have access to the following areas:
  - Division Staff Directory, Menu of Services, Job Opportunities, Uniform Complaint Procedures, Williams Complaint Procedures, Administrative Handbook, and Employee COVID-19 Testing
  - Human Resources Staff (menu of services, staff directory and HR mission and vision)
  - Classified Employment (job postings, recruitment, classified job descriptions, and internal transfer information as well as links to the personnel commission, merit system and board agendas/minutes)
  - Personnel Commission (rules, meetings and merit system) – the information is outdated as a staff member who is no longer with the district is listed as the contact for the personnel commission
  - Certificated Employment (job postings, recruitment, and internal Request for Transfer form)
  - Employee Health Benefits (benefits menu of services, employee benefits portal, medical benefit information, dental coverage information, vision coverage information, employee assistance program and COVID-19



benefits) – the benefit plan provided on the website is for the plan year 2020-21

- Risk Management webpage lists a menu of services, including Certificates of Insurance, COVID-19 information, Employee Assistance Program, Employee Wellness, Health Benefits, Industrial Injuries, Student Injuries, Safety Drills and Title IX Coordinator information. Each service, except for Title IX Coordinator, which is a statement regarding equal opportunity, includes working links to information or forms.
  - Forms/Handbooks (procedural and operational forms for employees and employee handbooks, leave of absence, change of address and various other forms)
  - Collective Bargaining Unit Agreements/Board Policies (ITA Collective Bargaining Agreement, CalPro Collective Bargaining Agreement, Administrative/Confidential Working Regulations, Link to 4000 – Personnel series board policies as well as to all board policies) – at the time of FCMAT fieldwork, CalPro no longer represented the district’s classified employees, and the district’s website should be updated accordingly
  - Absence Management System (instructional materials regarding reporting an absence)
  - Annual Notifications/Annual Report (Annual Notifications Handbook and Certification Page for 2018-19, 2019-20, 2020-21, and 2021-22)
4. Visitors seeking information about employment are directed to other sites such as NEOGOV or EDJOIN.

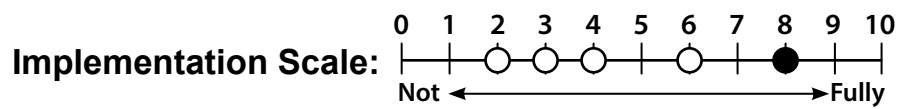
## **Recommendations for Recovery**

1. The district should ensure the department’s organizational chart is updated when changes occur and included on the department webpage.
2. The district should continue to ensure that the department website is updated regularly with accurate information. Additionally, each applicable HR webpage of the district website should provide a menu of services and whom to call/email with specific questions (e.g., leave approvals, substitutes, recruitment, contract management, credentials).
3. The HR website should be updated any time functions are reorganized or reallocated or when staff members change.



## Standard Fully Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	8
July 2022 Rating:	8





## 1.4 Organization and Planning

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### Professional Standard

The personnel function head is a member of the superintendent's cabinet and participates in decision-making early in the process.

### Findings

1. The district provided agendas and minutes for the county administrator's cabinet meetings showing that the interim chief HR officer is a member of the team and participates in decision-making.
2. The interim chief HR officer played a key role in decision-making and leadership related to district policy updates, enrollment and staffing projections for the 2021-22 fiscal year, reorganization of schools planning, reopening of schools, reductions in force, bargaining proposals, professional development planning, employee discipline, and nonreelection of certificated employees.

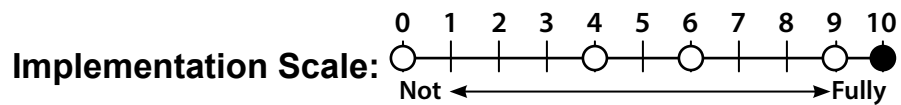
### Recommendations for Recovery

1. The district should continue to ensure that the chief HR officer is a member of the county administrator's cabinet.
2. The chief HR officer should continue to participate in decision-making related to staffing projections, reductions in force, bargaining proposals, nonreelection, professional development planning, employee discipline, and all other matters related to personnel management.



## Standard Fully Implemented

July 2013 Rating:	4
July 2014 Rating:	0
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	9
July 2018 Rating:	10
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 1.5 Organization and Planning

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### Professional Standard

The personnel function has a data management calendar that lists all the ongoing data activities and responsible parties to ensure meeting critical deadlines on California Longitudinal Pupil Achievement Data System (CALPADS)/California Basic Educational Data System (CBEDS) reporting. The data is reviewed by the appropriate authority prior to certification.

### Findings

1. The HR Department has implemented a data management calendar for CALPADS and CBEDS, and it is embedded within the district's document titled CALPADS Process and Procedures for IUSD, dated 2021-22. The previous review included a draft document for CALPADS and CBEDS procedures that has since been finalized. FCMAT was provided with evidence of communication via a reporting timeline document and data collection schedules shared between HR and IT. In addition, a document of CALPADS processes and procedures that provides objectives, procedural steps, timelines and a workflow of information for data flow for reporting purposes was identified during document review. The finalization of interdepartmental written procedures and workflow demonstrate continued progress in the development of documented procedures for data activities that involve HR.
2. Data collection has advanced considerably from the days when manual extraction was necessary to upload data. This practice required a data management calendar. Data is commonly extracted from Human Resource System (HRS) and Aeries through an automated procedure. Interviews with staff indicated and district documentation verified that the district uses the automated method to submit data, which decreases the need for a formal data calendar used in the outdated method. The data flow chart and procedural information created for CALPADS processes is helpful in establishing roles of the HR Department staff and clarity regarding how the information should flow between departments.
3. Data collection procedures have been documented for HR Department staff in working with the IT Department and school sites to prepare the necessary data. HR provided evidence of communications with IT about the data extracts.
4. The IT Department is responsible for leading CALPADS reporting for the district and prepared a 2021-22 document titled CALPADS Process and Procedures for IUSD, which provides a calendar of key tasks, personnel responsible, and dates for completion. The document is aligned with the CALPADS calendar on the CDE website.
5. HR staff reported that it is responsible for preparing data related to employees, credentials, authorizations, and assignments, and the 2021-22 process was collaborative and smooth. This was attributed to the implementation of electronic data collection, which requires



collaboration between IT and HR. Schools also play a role since the IT Department gathers reports and sends them to the sites to validate before certification to the state.

6. The HR Department's annual calendar of essential HR functions has been fully operationalized for several years and guides department planning and workflow. The calendar includes a general timeline throughout the year. The HR calendar references that CALPADS is formerly referred to as CBEDS; however, there is still minimal data collected through CBEDS, so this should be added to the HR calendar.

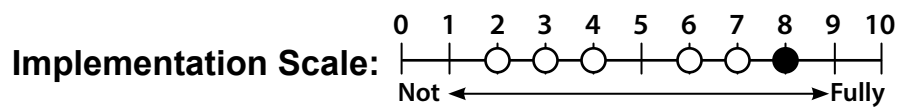
## **Recommendations for Recovery**

1. The district should continue to ensure that the HR Department takes responsibility for HR-related data and functions related to CALPADS and CBEDS, and that this effort is coordinated with the IT Department. The HR and IT departments should continue to work together to fine tune the work plan that identifies key tasks, personnel responsible, and dates for each task to be completed to ensure timely submission of required state reports. The interim chief HR officer should continue to review all information and perform a multiyear reasonableness review before certification of CALPADS and CBEDS and transmission of data to the state.
2. The district should ensure the HR Department continues to implement the annual calendar, increasing efficiencies and ensuring compliance with statutory requirements, state and federal employment laws, board policies and administrative regulations, and collective bargaining agreements. Key dates for CALPADS and CBEDS included in the CALPADS processes and procedures document should be added to the HR annual calendar to ensure that coordination of data collection with the sites and other departments is timely.
3. The district should continue to provide evidence of implementation of the protocols and procedures provided in the 2021-22 CALPADS processes and procedures document.



## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 3.8 Employee Recruitment/Selection

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### Legal Standard

In a merit system LEAs, recruitment and selection for classified service are in compliance with the rules of the Personnel Commission and all applicable requirements are followed. (EC 45240-45320)

### Findings

1. The district has had a merit system since 2008. When the district came under state receivership in 2012, the then state administrator suspended the personnel commission based on the requirement in EC 41322(b). In December 2012, classified employees submitted a petition to the board, although its powers reside with the state/county administrator, requesting termination of this system (per EC 45319-45320). The district conducted an election in March 2013 for classified employees to vote on whether to keep or terminate the merit system, and the majority chose to retain it. The district submitted a document for review regarding the status of the personnel commission. The document provides that earlier this year, the interim chief HR officer requested that the classified union and county administrator select their representatives for the personnel commission, and once the new commissioners were confirmed, they would select the third representative. The process was expected to be completed by January 2022; however, CalPro withdrew from its role as the representative for the classified bargaining unit. The classified bargaining unit elected to replace CalPro with California Teamsters Local 911 on March 4, 2022. The district expects that the process of implementing the personnel commission can resume with this new representation.
2. The continuing functions for classified personnel were shifted to the HR Department when the personnel commission office was closed. Based on FCMAT's interviews with staff, the personnel commission rules are consistently applied even though there is no personnel commission. Interviews conducted during fieldwork indicate that the HR generalist does not conduct formal group trainings with hiring managers regarding hiring processes but provides guidance and instructions on an individual basis. Documentation was provided to hiring managers with instructions for the recruitment and selection process. The HR manager position, recently eliminated, provided training for hiring managers. The district submitted a training on the merit system and the selection process for classified employees; however, there was no date or agenda, which documented when it was shared with hiring managers. The HR Department utilizes the services of the Cooperative Organization for the Development of Employee Selection Procedures (CODESP) for skills testing of all classified position applicants, as reflected in the department budget, except for management positions. The HR assistant prepares oral examination questions using CODESP and the job description as a source. The hiring manager has an opportunity to provide input on the job description, the preemployment skills test, and the interview questions.



3. The district's website has an active link to a webpage for the personnel commission, and the HR Department has an easily accessible webpage with a direct link to the district's merit system rules. The personnel commission rules have not been reviewed or updated since originally established in 2008. For example, Section 3.100.2 of the personnel commission rules states that part-time playground positions are exempt from the classified service; however, the related statute, EC 45256, was recently modified to eliminate the exemption for part-time playground positions, placing them into the classified service. The district provided an undated document regarding the status of the personnel commission and notes under Personnel Commission Rules that the department is in the process of reviewing rules for revisions, which will be posted to the website upon completion. In addition, the HR manager position is listed as the contact for the personnel commission and that position has been eliminated. A timeline was not provided regarding when this task would be completed.
4. FCMAT's review of a sampling of recruitment files and personnel files does not show additional evidence of the merit system process, including interview schedules, formation of interview panels, standardized interview questions, and eligibility lists with the first three ranks identified. During FCMAT fieldwork, the classified recruitment files selected were for positions that did not include a written skills test. There were errors in the recruitment documentation such as mistitled job titles for the selection process, and the files reviewed were missing an approved personnel requisition. The district has maintained eligibility lists for up to six months, which helps keep lists of candidates current.
5. According to the district's recruitment budget, the district continues to renew its membership in the PCASC and its umbrella organization, the California School Personnel Commissioners Association. The district reports that review of the personnel commission rules is in process, but did not designate a staff member who would be assigned this task, or an identified timeline as to when this work would begin. This task was in transition at the time of FCMAT fieldwork.
6. For its classified recruitment and selection process, the district uses NEOGOV, an automated applicant tracking system that supports the merit system with automated personnel requisitions, minimum qualification screening, tracking of preemployment skills testing, and other functions of recruitment and selection for classified personnel. Hiring managers can electronically review the applications and resumes for applicable candidates.
7. The Classified Employment link on the district's website leads to the NEOGOV website where the current job openings can be viewed as well as the job descriptions for classified positions in the district. In addition, applicants can submit their employment application through NEOGOV.
8. The district's Classified Employee Handbook was revised on January 10, 2022. It is included on the new hire checklist for classified employees and is provided during the onboarding process. The handbook includes a comprehensive section regarding the personnel commission rules and regulations, and there is a hyperlink provided to the



district website regarding the merit system and personnel commission. Hyperlinks are provided to various other resources, including the district's board policies and administrative regulations and the collective bargaining agreement.

9. HR Department staff indicate that a monthly classified hiring report is not part of the HR processes, and that they plan to implement this process soon. Documentation submitted during FCMAT fieldwork includes a classified staffing report that provides a classified recruitment and vacancy list, posting dates, examination dates, and other information about the status of the recruitment. The HR Department provided an annual report to the county administrator and board in November 2021 that included information on classified employee recruitments and employment actions for the prior year. The annual report is also posted on the HR Department website.

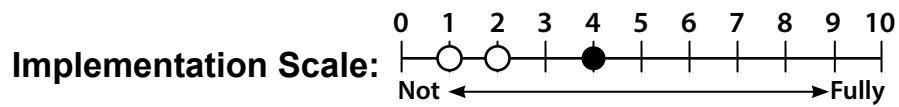
## **Recommendations for Recovery**

1. Until the personnel commission is reestablished, the district should continue to provide staff development on merit system rules and practices for staff in the HR Department, continue involvement with the personnel commissioners associations, and continue to consistently implement the merit system rules for classified personnel.
2. The district should assign an HR staff member to oversee the personnel commission policies and update the website contact information. In addition, the department should begin the process of reviewing and updating the personnel commission rules and regulations as necessary based on revised statutes or practices. The district should continue to include the rules and regulations in the appropriate sections of the Classified Employee Handbook along with a hyperlink to the document on the HR Department webpage.
3. The district should implement the process of completing a monthly classified hiring report that is reviewed for accuracy.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 3.9 Employee Recruitment/Selection

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### Professional Standard

The personnel function has a recruitment plan based on an assessment of the LEA's needs for specific skills, knowledge, and abilities. The LEA has established an adequate recruitment budget. Job applications meet legal and LEA needs.

### Findings

1. The HR Department worked with the Business Services and Educational Services departments in communication regarding enrollment and staffing needs for the 2021-22 school year. Interviews conducted during fieldwork indicate that the interim chief HR officer, CBO, and CAO met with principals in January to discuss staffing needs. In addition, an agenda from a principals' operational meeting held on September 16, 2021, reflects that the interim chief HR officer spoke to principals about staffing needs. Notes from the agenda indicate the district continues to experience a teacher shortage, and there was a significant number of teacher vacancies at the beginning of the 2021-22 school year. Site administrators indicated that staffing ratios had not been discussed with site leaders recently, and there was some frustration with the district's inability to meet staffing needs. The hiring processes are slower than previous year, and critical staffing decisions were not being made within a timeline that supported a strategic recruitment response. Problems regarding staffing at the appropriate level persist similar to past years. The operational difficulties related to recruitment and selection practices continue to diminish the district's ability to hire fully qualified teachers. Classified staffing has also continued to be an issue with many vacancies in place due to the district's problems in attracting and identifying qualified candidates. A review of the documentation and interviews with staff determined that the district has continued to struggle in effectively staffing all its positions, including management-level employees.
2. The HR Department has not established an effective response plan to the acute staffing shortages experienced by the district, and the operational recruitment procedures do not reflect the district's staffing needs. One of the major factors underlying this issue is the lack of competitive compensation for employees, which causes a significant recruitment issue. Employee compensation is not within HR's ability to change through operational procedures and practices. In addition, the district has experienced large numbers of teacher vacancies during the year under review that has stressed the substitute pools and resulted in the reassignment of teachers on special assignment to the classroom and principals serving there as substitutes. The district has implemented a more targeted and intentional use of certificated staffing by giving more consideration to temporary contract certificated employees. The HR Department implemented a practice of not releasing the temporary employee if there was a continued staffing need, which helps mitigate recruitment needs. Due to its significant staffing needs, the district continues to fulfill staffing needs with the use of consultants and/or independent contractors to fulfill acute staffing demands. This is especially the case for management and special education positions. The use of consultants is permitted for local educational agencies; however, the intent and purpose is to fulfill a short-term staffing need. Practices such as providing



consultants with a district email and including them in its staff directory or organizational chart creates confusion about their role within the agency. Use of a temporary staffing solution on a long-term basis can have significant fiscal implications and should not be a district staffing practice. Likewise, misclassification of a person as an independent contractor can carry substantial monetary consequences to the district such as payment of employment taxes, interest and penalties as well as the potential liability for reinstating the person as an employee with attendant leaves and benefits.

3. The HR Department has not established procedures and protocols to coordinate the tracking of post-retirement earnings for CalSTRS/CalPERS retirees working as independent contractors. In addition, misclassification involving the overuse of independent contractors and restrictions on post-retirement earnings are also an area of concern. State and federal laws provide earning restrictions for retirees who return to work with an employer in the same public retirement system from which they retired. The restrictions are intended to prevent retirees from generating earnings as an independent contractor, while also receiving retirement benefits. The district did not submit documentation that includes the steps and staff responsibility for monitoring retiree earnings, or how the district determines whether a worker should be classified as an employee or an independent contractor. AB 5 was signed into law by the governor in September 2019 and became effective January 1, 2020. The law requires employers to apply a three-part test, known as the ABC test, to determine whether a worker qualifies to be classified as an independent contractor rather than an employee.
4. Documents reviewed indicate that the district uses an independent contractor agreement that includes an agreement for consultant services. The document provides the date of services, rate of pay, and other critical information regarding the nature of the relationship between the district and the contractor.
5. The HR Department has developed an annual recruitment budget and has provided a detailed expenditure report reflecting funds available for various activities, which supports the resources needed to advertise position vacancies, utilize recruitment tools and resources, staff development for HR staff in recruitment strategies, and membership for legal updates and recruitment trends. Review of the recruitment budget reflects a priority on online recruitment tools such as NEOGOV, Job Elephant, and EDJOIN. Absent from the recruitment plan is a budget to attend job and career fairs, which is an especially effective method to recruit teachers. Documentation reviewed reflects agreements for teacher internships, demonstrating that the HR Department is working to create relationships with universities, which will help with teacher staffing needs. Interviews with staff reflect that the HR Department has prioritized outreach to universities to build the teacher pipeline for the district. In addition, district staff shared that the district is partnering with a program called New Leaders for building instructional leadership capacity. Documentation reviewed indicates that the HR Department hosted a job fair for both certificated and classified positions on August 13, 2021, which is late in the recruitment cycle, especially for fully credentialed teachers.
6. The HR Department did not provide evidence of registration confirmation for virtual or on-site job fairs other than the job fair hosted by the district.



7. The HR Department has developed detailed selection procedures for recruitment for both hiring managers and site administrators. They include, among other things, screening, interview, rating procedures, and selection. According to the recruitment procedures, HR staff play a limited role in the selection process. Interviews with staff reflect that the selection process is slow and does not keep pace with staffing needs, in addition much of the selection process responsibility has been transferred to the hiring managers and site administration.
8. Even though the district is offering some, it is not offering hiring incentives for hard-to-fill teaching positions (e.g., special education). Hiring incentives are an effective recruitment tool, which would enhance the district's recruitment profile. According to the HR webpage, the district is offering employment incentives for administrators, a \$5,000 induction stipend, and paid membership dues to a professional organization. In addition, nonmanagement certificated employment incentives include up to 15 years of teaching experience credited on the salary schedule, and a \$3,000 induction stipend.
9. Interviewees stated that the district continues to build relationships with local universities and encourages opportunities for student teaching. Documentation provided evidence of engagement with teaching programs, university job postings, or other correspondence, which provides verification of university engagement.
10. The HR Department updated a significant number of job descriptions during the review period. Many of the job descriptions reviewed include a proposal date, but no evidence of county administrator/board approval. The revisions in positions are reflected below:
  - Acceleration teaching specialist (Proposed August 11, 2021)
  - Attendance specialist (Proposed January 12, 2022)
  - Facilities accountant (Proposed August 11, 2021)
  - Instructional support aide (Proposed October 6, 2021)
  - Lead community liaison specialist (Proposed March 10, 2021)
  - Registrar (Proposed January 12, 2022)
  - Senior IT support (Proposed August 11, 2021)
  - CALPADS administrator (Proposed August 11, 2021)
  - Coordinator of charter school oversight (Proposed August 11, 2021)
  - Program specialist – teacher on special assignment (Proposed May 26, 2021)
  - School administrative assistant (Proposed January 12, 2022)
  - School office assistant (Proposed January 12, 2022)
  - Special education administrator-instruction (Proposed May 26, 2021)



- Senior executive assistant (Proposed November 3, 2021)
  - School site program support specialist (Proposed August 11, 2021)
  - Project manager—college and career readiness (Proposed August 11, 2021)
11. The job descriptions provided included a date that the job description was proposed, but not when it was presented and considered by the county administrator/board. Specifically, revised job descriptions included all job functions listed under essential duties and responsibilities, and essential functions were designated with an italicized “E.” Marginal job duties were included in the section but were not noted with an “E” if they were not essential, including “other duties as assigned.” Revised job descriptions included a statement at the end of the essential duties and responsibilities section that explains that essential duties are noted with an “E.” According to the Equal Employment Opportunity Commission (EEOC), the enforcement agency for the Americans with Disabilities Act, job descriptions must identify the essential functions, and employers must make employment decisions based on these. Other functions that are not designated essential are categorized as marginal and are not to be used as a basis for employment decisions, and both essential and marginal functions must be clearly identified in job descriptions. The job descriptions provided were on the standardized templates and formats.

## **Recommendations for Recovery**

1. The district should modify the annual recruitment budget to include attendance at job and career fairs, particularly for teacher recruitment.
2. The district should continue to update job descriptions to meet legal requirements and district needs as well as include adoption/revision dates and clearly identify job functions as essential and marginal to comply with the EEOC.
3. The district should continue to use the standardized formatting and templates for all job descriptions.
4. The district should develop and offer hiring incentives and work closely with the Business Services and Educational Services departments in identifying available funding and hiring needs early so that schools are fully staffed by the end of the year for the subsequent school year.
5. The district should continue to develop and support new and existing relationships with local colleges and universities and promote opportunities for credential candidates to student teach in the district.
6. The district should streamline the use of recruitment websites for ongoing recruitments of all areas of need. The district’s recruitment efforts would benefit from close review of NEOGOV, EDJOIN, and Job Elephant to determine the most effective online tool

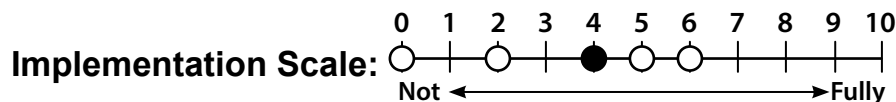


for recruitment needs. EDJOIN is the industry standard website used for certificated recruitment efforts.

7. The district should limit the outsourcing of staff via independent contractors and consultants for personnel and recruitment needs for all permanent positions. This will help mitigate employment costs and provide administrative oversight of internal employees.
8. The HR and Business Services departments should develop and implement shared procedures to maintain legally compliant relationships with consultants and independent contractors. The procedures should include the application of the common law control test, the ABC test, and communication protocols from HR to Business Services to help monitor CalPERS and CalSTRS retiree earnings. The district should review all proposed consultants and independent contractors to ensure they are properly classified.
9. The district should analyze recruitment timelines and procedures and determine if the process impedes its ability to recruit highly qualified candidates, in addition to the impacts on the hiring manager's workload.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 3.11 Employee Recruitment/Selection

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### Professional Standard

Selection procedures are uniformly applied. The LEA systematically initiates and follows up and performs reference checks on all applicants being considered for employment.

### Findings

1. The HR Department has written procedures on selection and hiring, including paper screening, interview panel procedures, and reference checking. The department uses standard interview questions and a weighted scoring system as a part of selection. The district performs routine preemployment testing of classified employees as a part of the selection process.
2. The HR Department provides hiring managers with individual support and training on the selection and hiring procedures and nondiscrimination in employment. Interviews indicated that a hiring manager trained in these selection procedures chaired all first-round interviews. Interviews also indicated that the hiring manager is largely responsible for the hiring process, including reference checks. Supervisors indicated this is burdensome and impedes their ability to manage an efficient recruitment process.
3. The HR Department employs a HR generalist who handles credentialing and is ensuring that all certificated applicants are appropriately credentialed and assigned.
4. The district was asked to randomly select recruitment files for review by FCMAT. Only two classified recruitment files and five certificated recruitment files were submitted for review. Of the five recruitment files for certificated teachers selected, four (or 80%) included verification that two reference checks were completed, and one (or 20%) included verification that three reference checks were completed. All recruitment files reviewed included evidence of completed reference checks. This reflects similar findings as noted in the previous review due to the district providing duplicative files from the 2021 review.
5. The HR Department continues to appropriately maintain recruitment files for each certificated, classified and management recruitment.

### Recommendations for Recovery

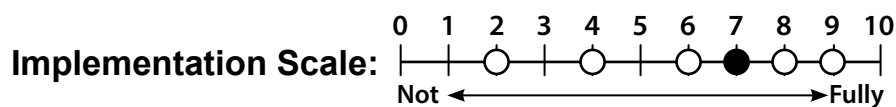
1. The district should provide hiring managers with formal and ongoing annual training in selection procedures, including accessing applications on recruitment websites, screening protocols, reference checking procedures, and nondiscrimination practices.



2. The district should continue to ensure that the hiring manager, an HR representative, or other management employee who has been trained in the selection procedures and processes chairs all interview panels. The HR Department should consider providing an HR representative to chair interviews when needed to ensure efficient recruitment procedures.
3. The district should continue to ensure that interview panel members are consistently required to complete the confidentiality statement. The statement should be maintained as part of the recruitment file. Panel chairs should ensure that they brief panel members of their responsibility for maintaining a fair and legally compliant process.
4. Reference checking should continue to be consistently performed when selecting certificated, classified and management personnel. The HR Department should continue with the practice of ensuring reference check forms are signed and returned to the department before offers of employment are made. Verification of reference checks should continue to be included in recruitment files.
5. The district should continue to maintain recruitment files separate from employment record/personnel files. Recruitment records should be retained as temporary personnel records, and records should be disposed of according to the district's retention policy.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	8
July 2018 Rating:	9
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	7
July 2022 Rating:	7





## 3.12 Employee Recruitment/Selection

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### Professional Standard

The LEA recruits, selects, and monitors principals with strong leadership skills, with a priority on placement of strong leaders at underperforming schools.

### Findings

1. FCMAT's review of principal job postings and revised job descriptions indicates that the duties of these positions were not revised during the year in review. Based on interviews and FCMAT's review of recruitment files, the district continues to make it a top priority to hire strong leaders.
2. Recruitment logs for principal positions indicate that, on average, first-round interviews are held within three weeks of the date of posting. The district maintains an efficient and competitive hiring process for principal positions; however, its ability to attract qualified candidates has diminished because of the lack of competitive salaries for this position.
3. The district uses a single certificated administrator evaluation form that aligns with guidelines from the CPSEL. While the title of the uploaded document indicates that it was updated in 2019, the form itself contains no such information. A sample review of principal personnel files indicated that none of the five principals reviewed included a recent evaluation in his or her personnel file.
4. The executive director of elementary education and executive director of secondary education in the Educational Services Department have been assigned to evaluate all the district's principals. The district reports that its principal evaluations in 2020-21 were not consistent, with some principals being evaluated and others not. However, the district also reports that all principals are on schedule to be evaluated during the 2021-22 school year.
5. The HR Department provided FCMAT with a list of principals who were last evaluated. Included on the list were 16 of the district's 18 principals. Eight principals do not have a record of the last evaluation, one was last evaluated in 2018, six were evaluated in 2019, and one principal had an evaluation date of 2020. The data reviewed reflects that only 5% of principals submitted for review were evaluated in the 2020 school year, and no principals were evaluated in 2021. Interviews with staff indicated that due to the virtual workplace brought on by the COVID-19 pandemic, evaluations for employees were suspended in the 2020-21 school year, which is reflected in the evaluation dates for principals.

### Recommendations for Recovery

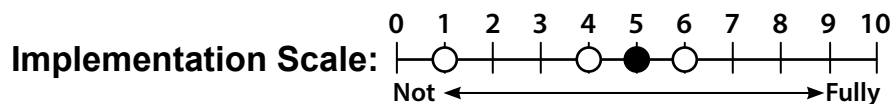
1. Cabinet members or designees who are responsible for the evaluation of principals should continue to use the principal evaluation system based on the CPSEL.



2. All forms should include their last date of update to ensure use of the most current ones.
3. An annual evaluation should be performed for all principals. An annual listing assigning evaluations should be provided to supervisors responsible for evaluating principals.
4. The district should continue to review and update the evaluation tool and the metrics used to evaluate principals. The district should continue to recruit and hire principals with strong leadership skills and a track record of successfully leading underperforming schools.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	4
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 4.3 Induction and Professional Development

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### Legal Standard

The LEA has developed a systematic program for identifying areas of need for in-service training for all employees. The LEA has established a process by which all required notices and in-service training sessions have been performed and documented such as those for child abuse reporting, blood-borne pathogens, drug and alcohol-free workplace, sexual harassment, diversity training and nondiscrimination. (cf. 4112.9/4212.9/4312.9), GC 11135, EC 56240, EC 44253.7)

### Findings

1. Board policies 4112.9, 4212.9, and 4312.9 provide regulations regarding the district's responsibility to communicate legal notifications to employees and place a copy of the employee's signed annual notice in their personnel record. Board policies related to annual notifications in the district were last updated in August 2014, while the CSBA version of the policy was updated in May 2020.
2. The district has trained its managers to assign Keenan Safe Schools online training modules to employees at their sites/departments. Injured employees are assigned Keenan Safe Schools training to improve workplace safety and are required to complete it prior to returning to work.
3. The HR Department continues to provide and document that all employees receive the annually required legal notices including, but not limited to, child abuse reporting, blood-borne pathogens, drug- and alcohol-free workplace, sexual harassment, diversity training, bullying, Integrated Pest Management Plan, safety, use of seclusion and restraint, youth suicide prevention, and nondiscrimination.
4. Additionally, the district also uses Keenan Safe Schools online training for mandatory new hire orientations, which includes understanding sexual harassment, blood-borne pathogens, preventing workplace violence, new employee training, and online mandated reporter training. These trainings are to occur prior to the first day of employment.
5. The annual notices continue to require that employees certify that they read and understand these policies.
6. Approximately 40% of the personnel files reviewed included evidence that employees receive the required legal notices upon initial hire, and approximately 60% showed that managers biennially received the required sexual harassment training. Files reviewed for management staff included 60% verification of the completion of mandated reporter training. Of the personnel files reviewed for certificated and classified nonmanagement staff, 100% included verification of completion of mandated reporter training. Electronic evidence submitted for review shows all employees have completed required sexual harassment and mandated reporter training for 2021-22.



## Recommendations for Recovery

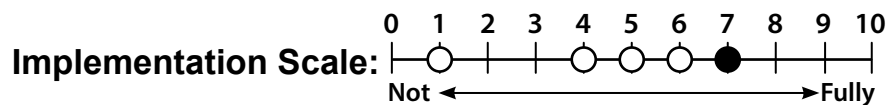
1. The district should review the most current CSBA policy and update district policies as needed to ensure legal compliance in the responsibility of annual notifications.
2. The district should continue to annually provide to all employees required legal notices, including, but not limited to, the following:
  - Sexual Harassment and Complaint Policies and ARs
  - Legal References: EC 231.5, GC 12950, 2 California Code of Regulations (CCR) 11023 District's Drug- and Alcohol-free Workplace Policies and ARs
    - Legal References: GC 8355; 41 United States Code (USC) 8102
  - Use of Pesticide Product, Active Ingredients, Internet Address to Access Information
    - Legal Reference: EC 17612
  - Prohibition of Activities That Are Inconsistent, Incompatible, in Conflict With, or Inimical to Duties; Discipline; Appeal
    - Legal Reference: GC 1126
  - District's Tobacco-Free Schools Policy and Enforcement Procedures (if the district receives Tobacco-Use Prevention Education funds)
    - Legal Reference: Health and Safety Code 104420
  - AIDS and Hepatitis B Policies and ARs
    - Legal References: Health and Safety Code 120875, 120880
  - Status as a Mandated Reporter of Child Abuse, Reporting Obligations, Confidentiality Rights, Copy of Law
    - Legal References: Penal Code 11165.7, 11166.5
  - Availability of Asbestos Management Plan; Any Inspections, Response Actions or Post-Response Actions Planned or in Progress
    - Legal References: Code of Federal Regulations (CFR) 763.84, 763.93
3. The district should continue to review and ensure annual notices to employees include board policies or administrative regulations that require them to be provided annually, including, for example, the district's technology use policy.



4. The district should continue to send annual notices electronically whenever possible and ensure employees certify that they received, reviewed, and understand them. The employee's signature certifying receipt and knowledge of the notices should continue to be required and included in the personnel record. However, the district should consider changing its board policy to allow for electronic retention of these records.
5. The district should continue to ensure that newly hired employees take the five mandatory online trainings before the first day of employment.
6. The district should keep accurate records of all mandated employee trainings and ensure that the records are either kept in the employee personnel file or electronically stored in a secure file.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	7
July 2022 Rating:	7





## 4.4 Induction and Professional Development

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### Legal Standard

The LEA's nondiscrimination policy and administrative regulations and the availability of complaint procedures shall be regularly publicized within the LEA and in the community, including posting in all schools and offices including staff lounges and student government meeting rooms. (cf. 4030, cf. 4031, GC 11135)

### Findings

1. Information about Uniform Complaint Procedures, including how to file a complaint, can be located on the main landing page of the district HR webpage. The executive director of HR & risk management has been designated as the complaints officer for those concerning school employees. Interviews with staff indicated that the director of employee relations and policy management, a new HR position, will be the designated complaints officer. The district website still lists the executive director of HR & risk management as the contact for complaints. The complaint form can be accessed by clicking the link for UCP Complaint Form. Users are routed to an electronic form provided by Informed K12. Complainants are then prompted to enter their name and email address to fill out the complaint form, which was updated in April 2020. During fieldwork, FCMAT could not access a Spanish version of the form via the district website, as once the form is accessed, there is an English-only complaint form available. In addition, the website does not provide information regarding how to access a hard copy complaint form, should the complainant not have access to technology.
2. Due to recent staffing changes in the HR Department, interviews with staff indicated that the executive director of HR & risk management is no longer responsible for engaging in the interactive process when an employee requests an accommodation or when an event triggers the district's responsibility to engage with employees who may be eligible under the ADA. According to HR staff, the benefits & risk management analyst is responsible for coordinating the interactive process, which was previously assigned to the HR specialist position. The district uses an external company, Shaw HR Consultants, to engage in the interactive process with district employees. A review of the menu of services on the HR webpage, assigns reasonable accommodations, which are part of the interactive process, to the HR specialist position. Based on the conflicting information and confusion communicated by HR department staff involving the assignment of work in this area, FCMAT could not determine the designated staff member for this critical task. In addition, it is concerning that a management level position is not assigned to the responsibility of the interactive process and workplace modifications. The HR Department assumes responsibility for this process and ensures that leave entitlements are appropriately tracked and monitored, overpayments or underpayments are minimized, and the rights of employees are protected.
3. Managers and supervisors are the district's first line of defense against claims of discrimination. The interim chief HR officer ensures that supervisors and managers receive training in this area. Trainings include a review of legal requirements, the role of



managers and supervisors in identifying triggers, conducting interviews with employees who may be eligible employees under the ADA, identifying essential functions, and when HR should be contacted in the process. In addition, the department provided hiring managers with written procedures regarding anti-discriminatory hiring practices in a document titled Do's and Don'ts.

4. The HR Department's employee handbooks for certificated and classified employees on its webpage include information on the process for reporting or handling complaints concerning school employees. There was no documentation that verified the interim chief HR officer provided retraining annually to site administrators and department managers on responding to complaints and conducting preliminary investigations.
5. The HR Department uses standardized forms for complaints and for the ADA interactive process.
6. The annual notices provided to employees include instructions and excerpts from board policies and administrative regulations regarding nondiscrimination, reasonable accommodations, and employee complaints.
7. Most of the board policies on nondiscrimination and administrative regulations regarding complaint procedures were updated to the CSBA template in April 2019.
8. During fieldwork, FCMAT's Facilities Team observed a Uniform Complaint Procedure posting in all classrooms visited.

## **Recommendations for Recovery**

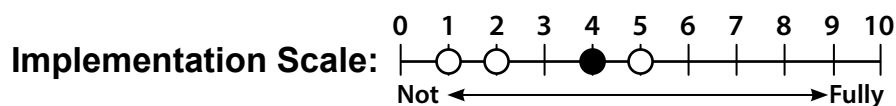
1. The district should ensure that nondiscrimination policies are posted in all school offices, staff rooms and student government meeting rooms.
2. The district should update the website to accurately reflect the staff member designated to receive and direct UCP complaint investigations.
3. Nondiscrimination policies should continue to be reviewed and updated according to CSBA's policy updates.
4. The HR Department should provide annual training to site administrators and department managers on responding to complaints, conducting preliminary investigations, identifying triggers to the interactive process, conducting interviews with employees, and identifying essential functions.
5. The district's BP 1312.1-Complaints Concerning District Employees was last updated in January 2013. CSBA provides a version of BP 1312.1 last updated in May 2019. The district should review policies concerning complaints and update for compliance with the law.



6. In compliance with EC 48985, the district is required to provide a Spanish version of the complaint form. The HR Department should provide both an English and Spanish version of the complaint form, and district staff and community members should have access via the district website. In addition, the form should be available in both English and Spanish in an alternative hard copy version.
7. The HR Department should continue to ensure procedures and standardized forms for complaints and for the ADA interactive process are consistently implemented. Standardized forms for filing complaints should be offered in an alternative hard copy format for complainants who may not have access to technology. Instructions regarding a hard copy version of the complaint form should be included in the complaint procedures.
8. The district should clearly define which staff member is responsible for the coordination of the interactive process. This should be communicated to all staff and the website updated.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	4
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 4.5 Induction and Professional Development

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### Professional Standard

Initial orientation is provided for all new staff, and orientation materials are provided for new employees in all classifications: substitutes, certificated, and classified employees.

### Findings

1. The HR Department maintains handbooks for the following:
  - Certificated employees (revision January 2022)
  - Classified employees (revised January 10, 2022)
  - Substitute teachers (revised January 10, 2022)
  - Classified substitutes (revised January 10, 2022)
  - Special education instructional assistants (January 10, 2022)
  - Custodial (January 2017)
  - Administrators
2. The issuance of the handbooks to new employees is included on the new hire checklist, except for part-time classified employees, and provided during new employee orientation. All handbooks, except for the handbook for administrators, are available online and are easy to access. The administrators' handbook was previously updated in 2015-16; however, it is now accessed by a link in Airtable. The link in Airtable directs the viewer to a page titled Principal and Administrator Resources and includes department directories, COVID-19 safety information, HR forms, and risk management information. Since the resources are provided via an electronic system, the date the documents were updated was not available for review. The HR annual calendar includes assignments to review and update the employee handbooks each year by June 30 of the fiscal year. As can be seen above, the handbooks have been kept current, except for the Custodial Handbook, which did not provide a review date.
3. The Custodial Handbook provides detailed cleaning standards and procedures.
4. The HR Department has developed orientation procedures that are consistently implemented. The orientation includes mandatory online training as noted previously. Also included in employee orientation is information on employment such as employee payroll, introduction of key staff members, and a general discussion about the district beliefs and culture.
5. Orientation materials for classified and certificated were submitted for FCMAT's review that include a PowerPoint for classified and certificated staff. Orientation topics included the district mission and vision, information about accessing forms, retirement details, employee evaluation, access to collective bargaining agreements, and other important



factors related to employment. Other documents reviewed included sign-in sheets verifying attendance at orientation.

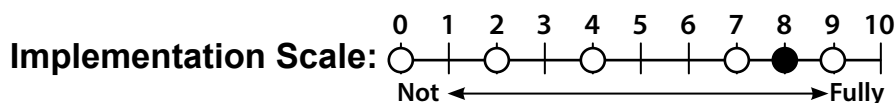
6. The department notifies the IT Department of newly hired employees. The IT Department sets up new employees' email accounts and, if applicable, logins to the district's student attendance/records management system and substitute/absence management system. Security access to the district's HRS module is divided between the HR and Business Services departments. Interviews indicate that the information flow between HR and IT regarding new employees is working well due to the Airtable system that HR uses to organize and manage employee data.

## Recommendations for Recovery

1. The district should continue to review and revise the employee handbooks, notify all employees of any changes, and ensure the most current versions of all the handbooks are available, except for the administrator handbook, to both internal and external users on the HR Department's Forms and Handbooks webpage.
2. The district should ensure that systems of accountability confirm consistent implementation to address situations such as those noted with cleaning standards and procedures in an updated Custodial Handbook.
3. The district should continue to expand and provide job-specific training for new employees, particularly for substitutes in preparation for their first assignment.

## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	7
July 2018 Rating:	8
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 4.6 Induction and Professional Development

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### Professional Standard

The personnel function has developed an employment checklist to be used for all new employees that includes LEA forms, including acceptable use of technology and state and I-9 federal mandated information. The checklist is signed by the employee and kept on file. Employment Development Department reporting is compiled within 20 days of employment.

### Findings

1. The HR Department uses new employee checklists that are filed in the personnel file. Revised forms ensure that all legally required notices, such as sexual harassment and complaint, use of pesticides, AIDS/hepatitis B, asbestos management, and the technology use policies (see Standard 4.3) are provided. A signature line for the employee and chief HR officer is included, affirming receipt of all required documents and explanation of all procedures and forms.
2. The HR Department completes the I-9 packet using the current version of Form I-9 as part of the employment process. The I-9 packet of newly hired employees is kept in a separate file as recommended. FCMAT's file review noted that the employment files reviewed did not include the employee I-9, except in one personnel file.
3. According to the 2010 regulatory changes, I-9 forms can be stored electronically, and the Department of Homeland Security/U.S. Citizenship and Immigration Service recommends that they be kept separate from other employment records. The HR Department has created a separate paper file and I-9 packets are filed alphabetically. The department is working to electronically store many forms and files maintained in the HR Department and should consider the I-9 packet as one of those files to be maintained electronically.
4. The new employee checklists were present in 100% of the personnel records of new certificated and certificated management employees whose files were included in FCMAT's file review (see Standard 5.4). In contrast, new employee checklists were present in 56% of the classified and classified management files reviewed.
5. The county office is responsible for reporting new or rehired employees to the Employment Development Department (EDD) within the 20-day limit required by California Unemployment Insurance Code Sections 1088.5 and 1088.8. The district has received confirmation from the county office that an electronic file is sent two times per month to the EDD to ensure compliance with the 20-day requirement.

### Recommendations for Recovery

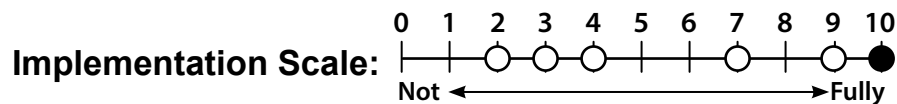
1. The new employee checklist should continue to be signed by the employee and chief HR officer and include all legally required notices.



2. The HR Department should ensure that the new employee checklist is consistently placed in the employee's personnel file.
3. Given that Form I-9 has been updated frequently in recent years, the HR Department should continue to ensure that it uses the most current version each time the form is needed.
4. The I-9 form should be omitted from all personnel files and stored electronically.

## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	7
July 2018 Rating:	9
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 5.1 Operational Procedures

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### Legal Standard

Regulations or agreements covering various types of leaves are fairly administered. (EC 45199, EC 45193, EC 45207, EC 45192, EC 45191) Tracking of employee absences and usage of time off in all categories should be timely and should be reported to payroll for any necessary salary adjustments.

### Findings

1. Interviews with HR staff, as well as supervisors throughout the district, indicate that employee absenteeism experienced a significant increase that affected district operations. Interviews indicate that this is attributed to problems the district experienced in getting employees to return to work from the virtual workplace that was in place during the previous review due to the COVID-19 pandemic. There was also an influx in state and federal leave entitlements for absences incurred for COVID-19 related reasons, which influenced employee attendance and created additional documentation and tracking functions. Absence summary reports were not provided to FCMAT to verify this; however, a sample report provided from the district's absence tracking system reflected absences of 110 employees, 36 of which were not filled with a substitute employee, on a single day.
2. The recent reorganization of the HR Department positions shifted leave tracking responsibilities to newly developed positions and new staff members within the department. This created training needs and additional staff support as newly hired HR employees acclimate to their job responsibilities. The executive director of HR & risk management oversees the leave tracking functions, which have been reassigned from the HR specialist position to the benefits & risk management analyst position. As an additional layer of administrative and clerical support, the administrative analyst provides support in helping to manage employee leaves by sending leave notification to employees and performing other administrative duties.
3. Interviews with staff indicate that the HR Department has struggled with providing guidance for supervisors and office managers on how to report and handle employee leaves. Supervisors reported that they feel overwhelmed by the number of employee leaves and absences, which was confirmed by HR. Supervisors reported that they receive information and responses from HR when they need assistance. Supervisors also report that HR is responsive to long-term absence needs and tries to meet requests for long-term substitutes efficiently. The difficulties in leave management for the district are attributed to the multiple staffing changes in the HR Department, and the frequent changes in the assignment of work in this area. In addition, many employers experienced a decrease in employee attendance as the result of the COVID-19 pandemic, which significantly affects operations but is not within the HR Department's span of control.
4. HR has continued taking responsibility to handle some of the employee leave functions such as monitoring sick leave usage and contacting employees that reach five consecutive



days of absence, sending Family Medical Leave Act (FMLA) notices to trigger the timeline, and calculating the 100 days of extended sick leave and notifying the employee prior to running out of paid leave. Forms and procedures that were previously implemented are ingrained in everyday activities. Interviewees continue to report coordination between HR, Risk Management, and Payroll to ensure that employees on leave are properly tracked.

5. The absence tracking and reporting function has been modified to an electronic process using Airtable. A review of the district website indicates employees can locate information regarding leaves under the Leaves of Absences page. Once routed to the page, menu options include COVID-19 related leaves, medical/disability leaves, FMLA, parental bonding, pregnancy disability, and industrial accident leave. There are also links to various forms, in addition to information about reasonable accommodations, the employee assistance program, and COVID-19 related leaves. All employee leaves are tracked through Airtable. The leave notice is initiated by the employee on the website, which then emails the notification to the HR specialist. This will initiate notification to the immediate supervisor, which includes a leave tracking sheet for supervisors to help track the absences. The absence reporting section in employee handbooks requires all employees to call their absences into Frontline, the district's absence management system. Evidence was provided to indicate that employees receive training in this system. Written procedures have been developed for employees and administrators to use Frontline. HR monitors Frontline for any employees who are absent five days or more so that HR can follow up with the employee and request a doctor's note if needed. All employees have been provided training and are required to report their absences through Frontline. Office managers are responsible for monitoring employees reporting absences, and if an absence is not reported, this information is forwarded to the HR specialist for follow up.
6. The district provided documentation of the policies concerning paid overtime procedures. In addition, supervisor training providing instructions for overtime and compensatory time procedures was submitted. Employees are required to submit an Overtime Pre-Authorization Form prior to the overtime being incurred. Document review indicated that a sample of employees had submitted preauthorization of overtime, then submitted verification that the time was worked. Supervisor signatures indicating approval were noted. FCMAT cannot verify how much overtime is worked compared with the prior year because the district has no central tracking mechanism, and staff reported these hours can be compensated with time off instead of pay. Any overtime hours compensated with time off are not tracked. Practices involving the tracking of overtime would improve if managed as an electronic process (e.g., Airtable).
7. The collective bargaining agreement for classified employees requires accrued vacation to be used within the fiscal year after it is earned, with a maximum carryover of 80 hours, granted on an exception basis. Administrative regulations limit management employees to a maximum carryover of 35 days. The HR website includes a Vacation Use Form and a Vacation Plan Form to allow employees to request vacation as well as plan a yearly vacation schedule. The website does not indicate that vacation request forms are accessible through Airtable, or how HR communicates with supervisors in assisting in the management of vacation.



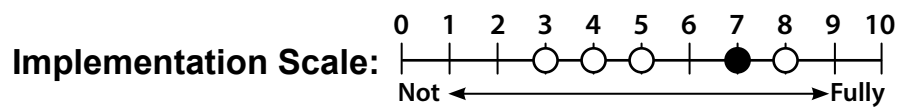
## Recommendations for Recovery

1. The district should provide frequent training and reminders for all supervisors on the management of employee leaves, and should provide support to supervisors dealing with leave issues to reduce the occurrence and cost of employee leaves.
2. The district should continue to require preapproval of all overtime worked and should also include overtime that is compensated with time off. All overtime worked should be required to be reported to Payroll so that compensatory time off can be centrally tracked and managed since it is a district liability. Management reports should be developed to monitor the amount of overtime worked, whether paid or compensated with time off.
3. The district should continue to require all employees to call the automated substitute calling system when they will be absent and use disciplinary policies for employees who bypass the system. With this approach, absence reporting from the system will include all district employees, and the data can be used to better manage employee leaves and post leave usage to their records.
4. The district should continue to prioritize the implementation of a time and attendance system that allows for employee leave time to be entered at each work site that is validated, posted to employee leave records, and then to the payroll system using Airtable. The district should include management of overtime and compensatory time in the electronic document management using Airtable. This will assist in creating accountability measures, in addition to improving communication between HR and Payroll.
5. The district should monitor accrued vacation to avoid payouts of excess vacation.
6. The district should prioritize the assignment of leave management and offer training and professional learning to new staff members in the HR Department assigned to the monitoring and management of employee leaves.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	5
July 2017 Rating:	7
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID pandemic
July 2021 Rating:	8
July 2022 Rating:	7





## 5.4 Operational Procedures

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### Legal Standard

Personnel files contents are complete and available for inspection. (EC 44031, LC 1198.5)

### Findings

1. Thirty personnel files, consisting of files for classified and certificated management and nonmanagement employees (five each for a total of 20) and 10 recruitment files, were requested by FCMAT for review. On the day of the file review, very few were immediately available. Department staff had to be reminded numerous times regarding this request and ultimately only twenty files were randomly selected and provided to FCMAT for review. These files consistently included the following items:
  - Annual employment notices (e.g., information regarding step/column placement, pay rates, class, work year, etc.)
  - Teaching credentials (for certificated employees only)
  - Resumes, applications, and transcripts
  - Emergency card information
  - Employment oath signed by the employee
2. Only 30% of the files contained a file inspection sheet compared to 44% in 2021 and 100% in 2019. Nearly all the classified personnel files that did not contain a file inspection sheet were files of employees hired within the last four years, and without exception the certificated files did not contain an inspection sheet, indicating that department staff do not consistently include a file inspection sheet.
3. Fifty-five percent of the files contained an employment history record card compared to 88% during the 2021 review. Of the 55% with an employment record card, 27% did not reflect changes in work site, position, promotion, or reinstatement following a layoff.
4. Evidence that employees have completed required sexual harassment and mandated reporter training is being maintained electronically, which is a best practice. According to the district's electronic records, the percentage of employees who have completed the required trainings rose from 92% in 2021 to 100% for this review, indicating that the district is ensuring compliance with these requirements.
5. Of the personnel files reviewed, only one contained the Form I-9, which is a significant improvement over prior years (see Standard 4.6).
6. Personnel files, health files, workers' compensation files, Americans with Disabilities Act files, and legal files continue to be stored in the locked records room. All file cabinets in the records room are also locked.



7. Evidence indicated that annual notice affidavits are completed as required. The HR Department is now keeping these files electronically, which represents a best practice; however, deviates from BPs 4112.9/4212.9/4312.9 (see Standard 4.3).
8. The Americans with Disabilities Act and the federal Health Insurance Portability and Accountability Act require all medical documents to be filed separately from other personnel or employment records. Of the personnel files reviewed, none contained these forms.
9. The district entered into collectively bargained agreements with its certificated and classified represented employee organizations to suspend evaluations during the pandemic. For that reason, most of the nonmanagement personnel files reviewed did not include a recent evaluation. However, 75% of the classified management files contained an evaluation completed within the last two years. Fifteen percent of the files for employees hired prior to 2020, and with five or more years of experience, have never been evaluated. In fact, one file of a classified employee hired in 1992 contained no evaluations.
10. Many evaluators interviewed indicate that documents received from HR regarding the date of the last evaluation are inaccurate. Specifically, they reported that routinely when they have evaluated employees and provided the documentation to HR, that the date has not been updated in the personnel management system. They attribute this to the lack of consistent staff in the HR office and a lack of clarity around the process. For example, some are unclear if evaluations are to be sent electronically, by district mail, or if they should be hand delivered to HR.
11. The records reviewed did not include evidence of progressive discipline or the use of performance improvement plans. However, interviews with evaluators indicated that progressive discipline and performance improvement plans are used when appropriate and that they find HR to be supportive in these cases.
12. Twenty-five percent of all files reviewed contained Social Security numbers (SSNs) or other personally identifiable information as compared to 56% at the time of the last review. A majority of the incidence of the SSN not being redacted were found on credentials, transcripts, employment history cards of long-time employees, indicating that the HR Department continues to make significant progress in this area.

## **Recommendations for Recovery**

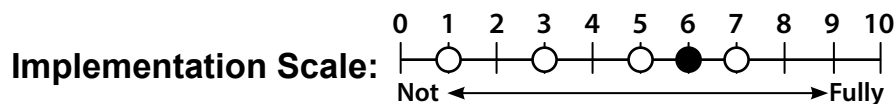
1. The employment history record, along with the file inspection sheet, should be the first documents visible to anyone accessing a personnel file. The employment history card should be kept up to date, including all changes in position and/or site assignment. If the entire employment history of all district employees is not maintained electronically, and until such time as all personnel files are electronic, changes in employment history should still be documented in the personnel file.



2. The district should ensure that all personnel files contain an inspection sheet. With the exception of those employees who must access personnel files in the course of their duties, anyone who views a personnel file must sign the inspection sheet.
3. The district should ensure that all employees are evaluated according to local collective bargaining agreements and board policy. Failure to ensure that employees are evaluated makes dismissal difficult even in circumstances where significant or serious misconduct has occurred.
4. The development and implementation of procedures related to the transmission of evaluation forms from site and department managers, timeline for documenting the date of the evaluation in HRS, and the filing of the evaluation in the personnel file are essential to ensuring efficacy in the performance management system. This is equally as important where performance improvement plans are concerned.
5. The district should continue to require employees to complete annual notice affidavits, the mandated reporter training and any required sexual harassment training. Continue to maintain these records electronically. The district should update BPs 4112.9/4212.9/4312.9 to reflect the current practice of collecting and maintaining these records electronically.
6. The district should continue to eliminate any SSNs or other personally identifiable information found in personnel files by reviewing each file accessed for this information and quickly redacting any SSNs found.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	6





## 5.5 Operational Procedures

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### Professional Standard

Personnel nonmanagement staff members have individual desk manuals for all of the personnel functions for which they are held responsible, and the HR Department has a process for cross-training.

### Findings

1. At the time of the last review, the HR Department had undertaken a significant reorganization resulting in a need for all desk manuals to be updated. At the time of FCMAT's last visit, a number of employees in the department were in their positions for less than six months. Despite this significant change and the short tenure of staff hired for the newly reorganized positions, desk manuals were under development, were superior in terms of content and organization than desk manuals developed in the past, and some were nearly completed.
2. Again this year, the HR Department had undertaken a reorganization with nearly all employees in the department being new to their positions. Desk manuals were a primary source of training as department staff settled into their roles. Desk manuals reside in Airtable, a cloud-based project management system, and are accessible to all department staff. Evidence suggests that Airtable is being used extensively by the HR Department and beginning to be used more by other departments.
3. HR Department desk manuals available in Airtable include, but are not limited to, the following:
  - Recruitment, Selection, and Hiring
  - Absence Management System
  - Benefits & Risk Management Department (for the Director and Analyst)
  - Employee Separation Procedures
  - HR Generalist
  - Fit for Duty Assessment/Referrals
  - Health & Voluntary Benefits Plan Implementation
  - HRS Data Entry
4. In addition to housing desk manuals, the HR Department uses Airtable to collaborate interdepartmentally and with school sites. Airtable is used by HR to upload and access the following district data:
  - Location
  - Employees



- Separations
- Vacancy/recruitment list
- New hires
- Job classifications
- Essential functions job analysis
- Employee credentials
- Credentials list
- Subjects
- Grade levels
- Salary schedules
- Bargaining units
- Staff memos
- Employee handbooks

5. Airtable was also being used by HR for the following:

- District-level contact tracing
- COVID testing project
- COVID vaccine management (students/staff)
- FCMAT, LCAP, and Strategic Plan alignment
- Complaints
- Claims management
- Concentration of risk
- Contract management
- Leaves of absence
- Retiree benefits
- Investigations
- Vendor directory
- Project management
- Recruitment planning
- Employee training/professional development
- HR annual calendar



- Performance evaluations/discipline
  - Master district calendar
  - Ergonomics request/management
  - HR/Risk procedures/desk manuals
  - Department of Transportation drug/alcohol testing
6. Employee forms and handbooks are available on the district website. Employee handbooks include certificated, substitute teacher, classified, classified substitute, custodial, and special education instructional assistant. Except for the Custodial Handbook, which did not include an adoption or revision date, all employee handbooks were revised in January 2022. The district should ensure that the Custodial Handbook cover indicates the date of its last revision. All handbooks should be reviewed annually and updated as needed.
  7. Each position has an identified back up, and there is evidence of cross-training. However, the number of changes combined with position vacancies and changing job titles has created uncertainty and role ambiguity for those in and outside of the department.
  8. The HR Department's annual calendar, which includes the Risk Management Department calendar items, continues to be used as a standing agenda item for discussion at the HR staff meetings.

## **Recommendations for Recovery**

1. Department staff should continue to develop, review, and revise their respective desk manuals. Desk manuals are dynamic documents and require revision any time a change is made in a procedure or systems improvement.
2. The district should ensure that data and information in Airtable is current, accurate, and that any confidential information is only accessible to those employees who need to do so in order to fulfill their assigned job duties.
3. The district should continue to update the HR annual calendar as necessary to keep it up to date. It should continue to be reviewed during each staff meeting to confirm that all staff members understand their role in ensuring these major activities are accomplished.
4. At its next revision, the Custodial Handbook cover should be edited to include a revision date. All handbooks should continue to be reviewed annually and updated as needed.
5. The district should work to clarify the roles and responsibilities of all positions in the HR Department. When changes are made, they should be well communicated to HR staff and to its customers. Additionally, as positions become vacant, the department should be acutely aware of the workload impacts to those individuals who are assigned additional duties, whether permanent or temporary, to determine their reasonableness and provide support wherever possible.



## Standard Partially Implemented

July 2013 Rating: 2

July 2014 Rating: 3

July 2015 Rating: 4

July 2016 Rating: 5

July 2017 Rating: 6

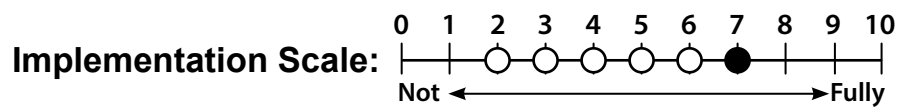
July 2018 Rating: 6

July 2019 Rating: 6

July 2020 Rating: Omitted per SB 98, Section 102 due to COVID-19 pandemic

July 2021 Rating: 7

July 2022 Rating: 7





## 5.7 Operational Procedures

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### Professional Standard

The personnel function has procedures in place that allow for both personnel and payroll staff to meet regularly to solve problems that develop in the processing of new employees, classification changes, employee promotions, and other issues that may develop.

### Finding

1. HR, Business Services, Payroll, and Risk Management continue to hold regularly scheduled monthly meetings to coordinate employee issues, provide training, and prepare cross-departmental procedures and forms, which are stored in Airtable. For example, evidence provided to FCMAT included agendas from monthly meetings on leaves of absence, procedures related to working out-of-class, substitute timesheets, and training on integrating workers' compensation benefits with Education Code leaves. Staff members in these departments report that the meetings are systemic and are essential in ensuring that employee situations are handled correctly. In between meetings, individual staff members report that they easily communicate with the other departments as needed when situations arise.

While HR and Business Services continue to be located in different buildings on the district office campus, it has not created barriers to their communication. Their shared use of Airtable has also assisted in improving their interdepartmental communications.

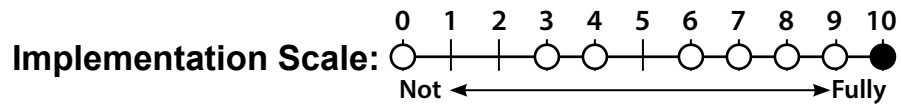
### Recommendation for Recovery

1. The district should continue its monthly regularly scheduled meetings between key HR, Business Services, Payroll, and Risk Management staff.



## Standard Fully Implemented

July 2013 Rating:	3
July 2014 Rating:	0
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	10





## 5.8 Operational Procedures

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### Professional Standard

Personnel staff members attend training sessions/workshops to keep abreast of best practices and requirements facing personnel administrators.

### Findings

1. HR staff were provided with the following trainings:
  - BEST (Business Enhancement System Transformation) will replace PeopleSoft Financial and HRS
  - Attendance and Leave Management Webinar
  - Professionals In Human Resources Association Conference
  - California Labor Management Initiative Summer Institute
  - HRS trainings at LACOE and internal IUSD training on adding new extra-duty assignments
  - ACSA Personnel Administrators Academy
  - ADA Disability Compliance Webinar
  - Merit System Academy
  - Interest-based bargaining
  - Classified layoffs
  - Keenan Safe Schools
  - Absence management training
  - HRS training
2. Verification of attendance at LACOE trainings included the following:
  - Introduction to HRS
  - Assignment entering
  - Adding new extra-duty position control numbers for teachers
  - Adding new extra-duty assignments
  - Leaves of Absence
  - Terminations
  - New hires

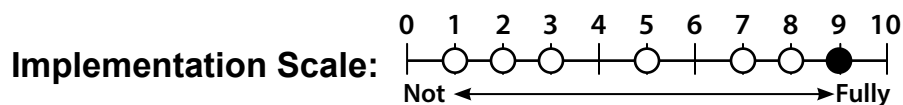


## Recommendations for Recovery

1. The district should continue to annually identify the training needs of the HR Department staff and the training available to meet those needs. The annual plan should be put in writing and include all HR Department staff.
2. The district should provide the HR Department with an annual budget to ensure resources are allocated for staff training and make certain the department is strategic in selecting trainings each year.
3. The HR Department should continue to send a representative to all personnel-related trainings provided by the county office whenever possible.

## Standard Fully Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	9





## 5.10 Operational Procedures

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### Professional Standard

Established staffing formulas dictate the assignment of personnel to the various sites and programs.

### Findings

1. Until last year, the Certificated Permanent Layoff Timeline document had been implemented consistently and was successful in ensuring that reductions in certificated service were identified by the end of January so that necessary reductions were made within the statutory timeline, and preliminary layoff notices issued by March 15. Despite this consistent practice, the district has a long practice of reemploying certificated employees as positions were not eliminated in HRS and appeared to be vacant. Personnel requisitions were generated, and staff were reemployed, resulting in perennial overstaffing. HR and Business Services have been working hard to ensure reduced positions are eliminated in HRS.
2. The district did not provide evidence of a Certificated Permanent Layoff Timeline or similar document for the 2021-22 school year.
3. The Business Services, HR, and Educational Services departments continue to work collaboratively to project enrollment and staffing needs and to meet and discuss staffing and any potential layoffs with certificated and classified exclusive representatives. Additionally, training was provided to principals regarding the certificated staffing timeline, status of layoffs, and transfer procedures. Discussions regarding enrollment projections, staffing needs, and assistance in preparing tentative master schedules at the secondary schools began in early January.
4. In addition to meeting with principals to review staffing and enrollment projections, district leadership met with each site administrator to review current staffing, anticipated attrition due to resignations or retirements, employees on temporary contracts, and any anticipated nonreelections. Changes in the instructional program are considered when identifying staffing needs for subsequent years, and enrollment projections, instructional program changes, and student needs are considered as the master schedules are developed at the district's secondary schools. This practice has been implemented for six full years and is becoming systematic.
5. The district does not have established staffing ratios other than those listed in the collective bargaining agreements.
6. The district is planning to reduce certificated service by 23.0 full-time equivalent (FTE) teaching positions.

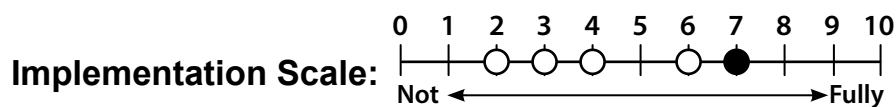


## Recommendations for Recovery

1. The HR Department should continue to work in collaboration with the Business Services and Educational Services departments, as well as school sites, to develop accurate enrollment projections no later than January of each year.
2. The district should reinstate the use of the Certificated Permanent Layoff Timeline document to ensure that necessary reductions can be made within the statutory timeline, and preliminary layoff notices issued by March 15.
3. The district should continue to monitor enrollment and class sizes after the school year begins to determine if second semester staffing should be adjusted and help ensure that staffing levels remain constant throughout the school year.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	7





## 5.11 Operational Procedures

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### Professional Standard

The LEA has implemented position control processes that incorporate the hiring and placement of all governing board-authorized positions. A reliable position control is a planning tool that has defined standards and formulas for tracking, adding, creating, and deleting positions within the organization to align staffing with budget and payroll systems.

### Findings

1. Board policy and administrative regulations require the board to approve appointments of new personnel on the recommendation of the superintendent. Since the district has a county administrator and the board is advisory, the county administrator regularly holds public meetings. Personnel transactions are brought to the meetings and approved by the county administrator. Assignments, reassignments, transfers, demotions, and other personnel actions are governed by collective bargaining agreements for represented employees and by board policy for those who are nonrepresented.
2. BP 3314-Payment For Goods And Services states that “Newly budgeted positions shall be approved at a Board meeting prior to filling the position. Payroll for new employees hired in open positions shall be processed with ratification of the employment occurring at a regularly scheduled Board meeting.” This allows changes to the position control database to be based on board/county administrator approval/ratification. The HR Department has procedures to ensure that all personnel transactions are submitted to the advisory board/county administrator for approval/ratification.
3. Each request to fill a vacancy is submitted on a PAF. The previous 13-step process, which is now electronic, has been reduced to nine steps. While this is an improvement in terms of the number of steps, it is still taking longer than it should to get positions approved for posting. Staff interviews indicated that cabinet level approvals can take up to a week and HR is sometimes a bottleneck in the process with PAFs sitting in the electronic queue for multiple days.
4. The district is using PAFs to approve positions prior to being advertised, although interviews indicated that sometimes personnel is hired before this process is completed. The district uses Position Control Forms for adding new positions, reinstating positions, replacing positions, or making changes to existing positions in hours or work year. The PAF and position control processes are duplicative in many ways and result in inefficiencies that delay the posting of vacancies and interfere with the timely filling of positions. HR is working to implement a process used by LACOE that will eliminate one of the forms and reduce the time between when a requisition is submitted and a vacant position is posted. The anticipated launch date is July 1, 2022.
5. Evidence provided by HR related to terminated assignments indicates that 101 employees had terminated assignments between July 2021 and February 2022. Five of the entries indicate that the terminations were related to the termination of extra-duty or substitute



assignments. It is unclear if the remaining 96 terminated assignments were due to layoff, elimination of positions through attrition or if these positions were eliminated in the budget. Additionally, the list included positions that are vacant, filled by an interim, or that are active and filled positions in the district (e.g., chief HR officer, director of student support services, executive director of IT).

6. The HR Department has not let the obstacles associated with HRS, its position control shortcomings, or the delayed implementation of BEST stand in the way of progress. The department is using Airtable, a cloud-based spreadsheet-database hybrid, to fill the information access gap. Implementation of Airtable began in HR and is beginning to be used throughout the district. Airtable is able to sync with other databases and information systems, eliminating the need for data entry that is duplicative. Airtable will also be applicable after the BEST system implementation.
7. The district did not provide any evidence related to assignment monitoring or credential audit by the county office.
8. Consistent with the last review, budget controls and preauthorizations continue to be in place for multiple extra-duty, extra-hours, and overtime assignments. Payroll continues to ensure principals, directors, office managers, and administrative secretaries submit requisitions in advance. Payroll does not pay employees unless an approved position control form has been submitted and is board/county administrator approved. The district has a process to monitor the extra-duty assignments of part-time classified employees to ensure that the extra hours do not become part of the employee's regular assignment by default according to EC 45137.
9. Payroll and HR staff members reported that they meet monthly to reconcile position control and to correct errors; however, actual payroll and position control are not reconciled.
10. Certain vacancies in the Special Education Department continue to be filled by contracting with a nonpublic agency (NPA), such as instructional assistants and behavior-related positions. At the time of FCMAT's last review, the district arranged for an external review of these engagements, audited every individualized education plan of students requiring a 1-to-1 instructional assistant being provided by an NPA, and was able to fade the level of support provided to these students, and, to the extent possible, eliminate the need for a large majority of 1-to-1 NPA positions. At the time of this review, the district reported continued progress in reducing the use of independent contractors. Additionally, the Special Education Department is closely monitoring caseloads and has closed and/or collapsed eight special day classes since the last review.

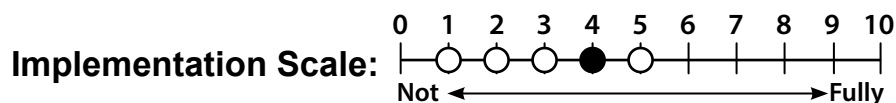


## Recommendations for Recovery

1. The district should continue to implement the electronic personnel requisition process with fidelity, which includes annual training to school site administrators and office managers. If the district successfully consolidates the current PAF and position control forms and processes, it should ensure that written procedures and workflows are updated, well-communicated, and that users are provided with adequate training and support. Additionally, the new procedures should ensure that the process is timely and that approvers are held accountable to established approval timelines.
2. The HR Department should continue to ensure that all personnel transactions are submitted to the advisory board/county administrator for approval/ratification.
3. The payroll and HR staff members should continue to meet monthly to reconcile position control, accurately identifying and documenting the reason for any termination.
4. The district should continue to reduce the number of contracted employees in special education.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	3
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 7.1 Use of Technology

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### Professional Standard

An online position control system is utilized and is integrated with payroll/financial systems.

### Findings

1. The district uses the LACOE software applications HRS for position control and HR functions and PeopleSoft for budget and business functions. The district continues to clean-up data in HRS to ensure that it reflects properly in position control for budgeting purposes. Over the past several months, the interim chief HR officer and HR staff members met regularly with Business Services and school sites to review staffing lists to reconcile and continue the process of validating and cleaning up data errors. The following are some of the ongoing activities being utilized to ensure data integrity and proper information in the budget side of position control:
  - Position control meetings (HR and Business Services)
  - F-38 (position control) reports
  - Audit vacancy reports
  - Data clean-up in HRS
  - Reducing in-system manipulation, which leads to fewer potential errors
  - School site rosters (Google Docs)
2. Implementation of the BEST system, which will replace PeopleSoft, has been delayed. However, the HR Department has not allowed HRS's limitations, its position control shortcomings or the delayed implementation of BEST, to impede progress. The department is using Airtable, a cloud-based spreadsheet-database hybrid, to fill the information access gap. Implementation of Airtable began in HR and is beginning to be used throughout the district. The district also uses Airtable for tracking employee absences, leaves, industrial injuries, and the return-to-work program.
3. For more than four years, the district has used NEOGOV for classified job openings and applicant tracking. HR staff and hiring managers across the district reported that this system works well for the recruitment and selection activities related to classified personnel. The district continues to use EDJOIN for posting certificated openings, which directs applicants to NEOGOV.
4. The HRS system drives the payroll system and without an employee being in the HRS system, payroll will not be generated for that employee. Similarly, if incorrect information is contained in HRS, payroll information will be incorrect. The district issues manual advances from its revolving account to deal with these situations (see Standard 8.2 in the Financial Management section. FCMAT's review of the revolving account showed that the number of handwritten checks for missed payments have decreased from the prior review



period and varied from zero in some months up to seven in one month. The HRS/position control system is not reconciled to actual payroll.

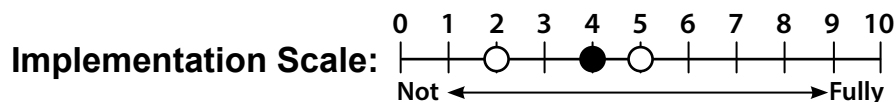
5. See Standard 5.11 for additional findings related to position control.

## Recommendations for Recovery

1. The migration to the BEST system will require the district to develop a formal training plan and ensure that all HR staff receive the training and ongoing support to ensure successful implementation.
2. The district should continue to use Airtable to improve access to and the functional organization of personnel information and data as well as for tracking employee absences, leaves, industrial injuries, and the return-to-work program. The district should integrate position control with the payroll system.
3. No matter the system used, position control should be reconciled monthly with payroll.
4. See Standard 5.11 for additional recommendations to improve position control.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	4
July 2108 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 7.2 Use of Technology

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### Professional Standard

The LEA provides professional development in the appropriate use of technological resources that will assist staff in the performance of their job responsibilities when need exists and when budgets allow such training. (cf. 4131, 4231, 4331)

### Findings

1. The HR Department website continues to be easily found from the district's home page. The website includes many resources for the public and for employees, such as a division staff directory, menu of services, procedures and forms, employee handbooks, annual notifications, absence management system, collective bargaining agreements, salary schedules, and personnel commission rules. Some information is outdated (e.g., 2015-16 salary schedules). Additionally, the website has been updated to include information related to COVID-19 including submitting proof of vaccination, registering for testing, onsite testing schedules, frequently asked questions, and the district's vaccine clinic schedule.
2. The HR Department continues to use NEOGOV and other online recruitment and applicant tracking systems (see Standard 7.1) to handle classified and certificated recruitments. Hiring managers have been provided training on how to access these systems to review applicant paperwork.
3. Online personnel requisitions and the workflow continue to be used by staff across the district. The system is fully functional, has been reduced in steps (see Standards 5.11 and 7.1), and is cited by users as a significant gain in efficiency and a way to track the progress of requisitions.
4. The HR Department has experienced a significant reorganization requiring new staff to be trained in the use of technology, including HRS (see Standard 5.8).
5. The HR Department continues to use Airtable to which all staff members in the department have access to coordinate staff calendars and meetings, and document and share procedures and desk manuals as they become available, which enhances cross-training. Staff members have incorporated access to Airtable as a regular part of their daily work.
6. HR has continued to use and improve its online onboarding process for new employees, which continues to be of significant benefit.

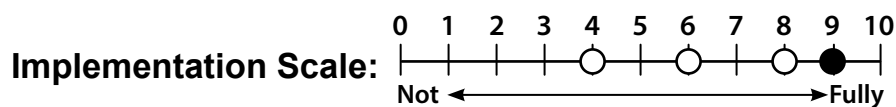


## Recommendations for Recovery

1. The district should review the webpage and update all resources to reflect current information.
2. The district should ensure recurring training, possibly annually, for the existing technologies used by the HR Department staff.
3. As the department continues to implement additional automated functions, such as electronic document storage, and expand the use of Airtable, it should ensure that department staff receive adequate training to implement and maintain these additional systems.

## Standard Fully Implemented

July 2013 Rating:	4
July 2014 Rating:	4
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	6
July 2018 Rating:	8
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	9





## 8.1 Evaluation/Due Process Assistance

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### Legal Standard

Clear policies and practices exist for the regular written evaluation and assessment of classified (EC 45113) and certificated employees and managers (EC 44663). Evaluations are done in accordance with negotiated contracts and based on job-specific standards of performance. A clear process exists for providing assistance to certificated and classified employees performing at less-than-satisfactory levels.

### Findings

1. The district has developed BP/AR 4115, revised February 20, 2019; BP 4215, revised August 4, 2014; and BP 4315, revised February 20, 2019 to provide regulations regarding the district's practices of employee evaluation.
2. Education Code requires that all certificated employees with permanent status be evaluated at least every other year. Classified employees with permanent status must be evaluated annually. These Education Code requirements were not waived due to the COVID-19 pandemic. However, the district entered into MOU agreements with its represented certificated employees to suspend evaluations of permanent staff in the middle of the 2019-20 school year and to waive the evaluation requirements for permanent staff for the 2020-21 school year. Evaluations for classified employees were suspended for permanent staff for 2020-21. The district reported that it had consulted with its legal counsel before entering into these MOUs and included language that disciplinary matters would continue to be addressed during the waiver period. As a result, all employees in the district must be evaluated in 2021-22, which puts a significant burden on evaluators, many of whom are focused on evaluating probationary employees and up to half of their permanent certificated employees with plans to evaluate the other half in 2022-23. FCMAT would expect all evaluations for district employees, certificated and classified, to be current during 2023 fieldwork.
3. The HR Department continued to provide supervisors with a list of all probationary employees under their supervision and the schedule for performing the evaluations required prior to the granting of permanency status to ensure that permanency status was not granted to certificated or classified employees not meeting standards or not demonstrating competency in their assigned role. Evidence provided to FCMAT shows that certificated non-reelections and classified probationary releases have occurred during this review period.
4. The HR Department continued to provide training to supervisors during the 2021-22 school year, including training in effective evaluation techniques; however, it was a reduced version due to the impact of COVID-19. Managers continue to consistently report receiving improved guidance and support in this area.
5. The HR Department held a voluntary evaluation training related to certificated evaluations on Thursday, October 7, 2021. There is no evidence that a similar training, specific to classified employee evaluation was held either on a mandatory or voluntary basis.



6. The district has not established written procedures for classified employee performance improvement planning but has developed and provided training in the use of standard forms for this purpose. The improvement plan provides the employee with examples of unsatisfactory performance in the areas of work quantity, quality, work habits, personal relations, and initiative. At the time of the last review, the plan did not, however, identify who will monitor the plan and provide support or when progress will be measured.
7. FCMAT requested that the district provide five sample improvement plans developed and monitored during the 2020-21 or 2021-22 school year. One sample certificated improvement plan was provided and was dated May 13, 2021. The certificated Performance Improvement Plan (PIP) identifies performance that is unsatisfactory as it relates to the California Standards for the Teaching Profession (CSTP) and gives specific examples of the employee's below standard practice, desired behavior, the date when the employee was expected to demonstrate competency, who would monitor progress, and additional workshops/classes/curriculum development supports.
8. While there is evidence that the district has developed forms for certificated and classified performance improvement planning, and at least one certificated employee received an initial PIP in May 2021, there is insufficient evidence to suggest that managers in the district are engaging in performance improvement planning when employees are performing below standards or that such plans are implemented and monitored with fidelity.
9. The HR Department continues to provide support to evaluators who are working with struggling employees. Evaluators report that the interim chief HR officer is accessible and supportive. Staff voiced concern about losing support during a transition in this position since the interim chief HR officer is a LACOE employee and interim in his role. The recent instability of staff in the HR Department has resulted in an overall lack of confidence in the department.

## **Recommendations for Recovery**

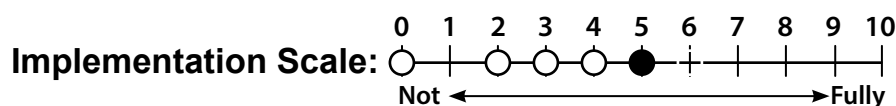
1. The suspension of certificated evaluations in 2019-20 and the waiving of evaluations in 2020-21 for permanent employees required that all employees in the district be evaluated in 2021-22, placing significant pressure on school site administrators and increasing workload concerns during the review period. The district needs to be aware of the obstacles this presents in subsequent years and provide the needed support to school site administrators in this area.
2. The district should ensure that all employees have been evaluated according to EC 45113 for classified, EC 44663 for certificated employees and managers and respective collective bargaining agreements and board policy.
3. Supervisor evaluations should continue to include criteria related to completing certificated and classified evaluations as required by the collective bargaining agreements, ensuring that evaluations are well written, demonstrate competency, and help struggling employees using the district's standard PIP forms. Additionally, managers should be expected to hold employees accountable to high standards of conduct through progressive discipline measures.



4. The district should continue to ensure that the HR Department annually provides supervisors with a schedule of evaluations based on timelines established in the certificated and classified collective bargaining agreements. Additionally, HR should continue to inform the supervisors of employees who are due to be evaluated in the current school year. The list of evaluations that are due should include the date of the employee's last evaluation as well as his or her status as a temporary, probationary, or permanent employee.
5. The district should ensure that managers participate in mandatory training annually on effective supervision and evaluation techniques. The district should continue to ensure that annual training is provided in progressive discipline and improvement planning.
6. The district should develop policies and procedures related to classified employee discipline, written protocols related to nonreelection of certificated staff, probationary release of classified personnel, and the granting of permanency status.
7. The district should continue to enter and track employee status (temporary, probationary, permanent) in the position control system.
8. The district should continue to implement the PIP form and process and offer struggling employees assistance and support. The district should provide annual training related to performance improvement planning, ensure managers are engaging with employees when they are performing below standards, and that PIPs are implemented and monitored with fidelity.

## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	5





## 8.3 Evaluation/Due Process Assistance

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### Professional Standard

Management has the ability to evaluate job requirements and match the requirements to the employee's skills. All classified employees are evaluated on performance at least annually by a management-level employee knowledgeable about their work product. Certificated employees are evaluated as agreed upon in the collective bargaining agreement and California Education Code. The evaluation criteria are clearly communicated and, to the extent possible, measurable. The evaluation includes follow-up on prior performance issues and establishes goals to improve future performance.

### Findings

1. The district has convened an evaluation committee to review classified evaluation forms and recommend revisions to the classified collective bargaining team. At the time of FCMAT's last review, the classified bargaining unit had appointed unit members to participate in this work, and the committee had met three times to review a large number of evaluation forms from other districts. All forms under review included job-specific evaluation criteria related to minimum competencies.
2. At the time of FCMAT's last review, the district and the ITA evaluation committee were working together to develop and recommend new evaluation forms and procedures that align with the CSTP.
3. At the time of FCMAT's fieldwork, the district reported that it was meeting with an evaluation committee to go over district evaluation forms/procedures and sample evaluations from other districts to be able to draft an updated evaluation form/procedures. Once the updated draft is complete, it shall be presented as a recommendation to the ITA, California Teamsters Local 911 and IUSD bargaining teams for possible implementation. The current evaluation forms and procedures remain in effect as they have not been updated through the bargaining process. The district reported that it would provide FCMAT with evaluation committee agendas and samples of evaluations/performance improvement plans from other districts that the teams have been reviewing. No such agendas or samples were provided to FCMAT.

### Recommendations for Recovery

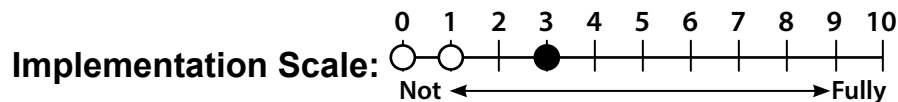
1. Negotiated changes to the classified evaluation forms should ensure that classified evaluation criteria include job-specific requirements so that managers are expected to evaluate position core competencies and that permanent status is granted only to employees who demonstrate competency.
2. Negotiated changes to the certificated evaluation tool should ensure that criteria are consistent with the CSTP and that the tool ensures that teachers meet minimum competencies when granted permanency status.



3. The district should continue to track completion of certificated and classified management and nonmanagement evaluations.
4. The district should ensure that evaluations are completed as required by law and local collective bargaining agreements, are timely, and placed in personnel files.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	1
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 9.5 Employee Services

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### Professional Standard

The LEA's Workers' Compensation unit is actively involved in providing injured workers with an opportunity to participate in a modified duty/return-to-work program. Updates are regularly provided to the cabinet.

### Findings

1. Risk management policies, procedures, and forms are all accessible on the district's website including the following:
  - Employee rights
  - Company nurse
  - Industrial injury clinics
  - Notices to medical providers in English and Spanish
  - Physician predesignation
  - Temporary pharmacy card
  - Links to additional resources such as the Department of Industrial Relations and the Division of Workers' Compensation
  - Benefits and risk management analyst contact information
2. The HR Department has prepared written procedures and checklists for managing workers' compensation cases, and most of the process, including the assignment of modified and/or light duty, has been automated. The major duties of the benefits and risk management analyst can be backed up by other staff in HR as necessary.
3. The district has created a procedures manual for industrial injury and illness reporting. All the forms related to reporting have been implemented through an online process, including instructions for completing the forms. Policies and procedures for work-related injuries/illnesses are included in employee handbooks, and online safety training is provided for new employees as well as those on modified duty and are accessible from the HR website training page.
4. The district has a board policy and administrative regulation that provides for transitional assignments to help employees return to work under temporary light duty. The procedures and standardized forms, including a Transitional Return-to-Work Agreement, continue to be implemented with fidelity, are systemic in their use, and a process for annual review is in place. The district's return-to-work and modified duty program continues to reduce the number of days employees are off work due to industrial injury or illness resulting in continued year-over-year savings.



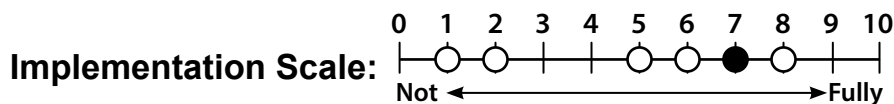
5. Payroll and HR have access to information related to critical claim dates through Airtable and continue to implement cross-departmental procedures with fidelity. Employees continue to be notified when their leave is about to be exhausted and are offered Americans with Disabilities Act accommodation meetings to engage them in the interactive process. These procedures and spreadsheets are now systematic and have been implemented consistently for the last three years.

## Recommendation for Recovery

1. The district should continue to conduct investigations of workers' compensation claims, actively engage employees in return-to-work programs, conduct preventive training, provide resources to supervisors and employees, and conduct other best practices in risk management to reduce its costs in the long run.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	2
July 2015 Rating:	1
July 2016 Rating:	2
July 2017 Rating:	5
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7





## 10.2 Employer/Employee Relations

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### Professional Standard

The personnel function provides a clearly defined process for bargaining with its employee groups that involves site-level administrators.

### Findings

1. The district entered into negotiations on a successor agreement with ITA during 2021-22.
2. The ITA collective bargaining agreement included updates to the Leave, Grievance Procedure, Workday and Hours, Transfer and Reassignments, Organizational Security, Intermediate Discipline, Association Rights, Negotiation Procedures, and Term articles. The district and ITA participated in IBB training and used the process during their 2021-22 negotiations.
3. The CalPro collective bargaining agreement was renegotiated in 2018 and expired at the end of the 2020-21 school year. At the time of FCMAT's fieldwork, classified employees were no longer represented by CalPro, although subsequently classified employees elected to be represented by California Teamsters Local 911. The provisions of the existing agreement will continue to govern the employment relationship between the district and classified employees until such time as a new exclusive representative is identified. Based on FCMAT's review of the district's website, the collective bargaining agreements, salary schedules, and other related information continue to be accessible on the HR Department website, which is now more easily accessible from the district's home page.

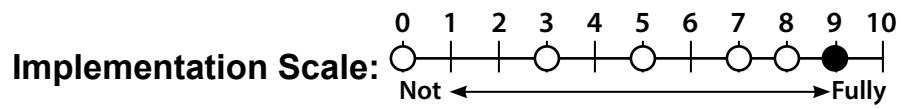
### Recommendations for Recovery

1. The district should continue to ensure that input from all site administrators and classified department managers is obtained when preparing for labor negotiations each year. This should include feedback on the collective bargaining agreements and proposed changes to the provisions to improve student achievement, management flexibility, and operations.
2. The district should continue to include site administrators and/or department managers who supervise bargaining unit members on the collective bargaining teams as well as a representative from Business Services.



## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	3
July 2016 Rating:	5
July 2017 Rating:	7
July 2018 Rating:	7
July 2019 Rating:	8
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	9





## 10.3 Employer/Employee Relations

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### Professional Standard

The personnel function provides all managers and supervisors (certificated and classified) training in contract management with emphasis on the grievance process and administration. The personnel function provides clearly defined forms and procedures in the handling of grievances for its managers and supervisors.

### Findings

1. The grievance process is documented in the collective bargaining agreements, which are accessible, along with the forms, to administrators and staff on the HR Department webpage, which is now easily accessible from the district's website.
2. No formal grievances were filed during the past year. District and ITA representatives indicated that the IBB process is being used in joint committees as well as in regular meetings between management and labor to resolve concerns at the lowest possible level.
3. No evidence of training in contract management with an emphasis on the grievance process was provided to FCMAT.

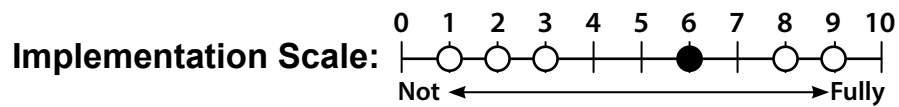
### Recommendations for Recovery

1. The district should continue its regularly scheduled communication meetings with ITA to foster the ability to resolve issues at the lowest level.
2. Once a classified exclusive representative is in place, it is recommended that the district invite them to consider IBB training as well as the opportunity to engage in monthly, or more frequent, problem-solving meetings.
3. The district should ensure training is provided to new managers and refresher training for incumbent managers, with priority given to managing employee leaves, workers' compensation, evaluation, and grievances.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	6
July 2018 Rating:	8
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	6





## 10.4 Employer/Employee Relations

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### Professional Standard

The personnel function has a process that provides management and the board with information on the impact of bargaining proposals (e.g., fiscal, staffing, management flexibility, student outcomes).

### Findings

1. The district continues to ensure that a representative from Business Services as well as site and department managers are represented on the management bargaining teams.
2. During 2021-22 negotiations with ITA, an AB 1200 disclosure was completed related to the successor agreement.
3. An AB 1200 disclosure was also completed following the agreement with CalPro to provide hazard pay because of COVID-19.

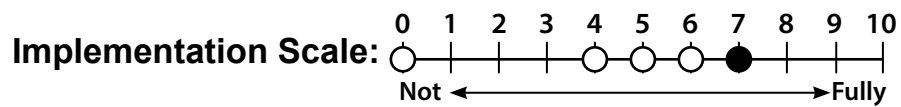
### Recommendations for Recovery

1. The district should ensure that Business Services continues to have a representative on both district negotiating teams and that HR and Business Services continue to provide management and the advisory board/county administrator with information on the effects of bargaining proposals, (e.g., fiscal, staffing, management flexibility, and student outcomes). The multiyear impact should continue to be determined and updated for every proposal before it is presented during bargaining.
2. The district should continue to ensure that it timely fulfills its obligations for oversight of any collective bargaining settlements in accordance with AB 1200 and the requirements of GC 3540.2 and EC 42131.
3. Changes in the collective bargaining agreements should continue to be sought to ensure that programs and services can better support student achievement and to restore fiscal solvency.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	4
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7









# **Table of Personnel Management Ratings**







Personnel Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.1 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The local educational agency (LEA) has clearly defined and clarified roles for board and administration relative to recruitment, hiring, evaluation and discipline of employees.	0	0	4	4	4	4	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
1.2 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function has developed a mission statement and objectives directly related to the LEA's goals and provides an annual report of activities and services offered during the year.	1	1	3	3	5	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7
1.3 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function has an organizational chart, functions chart and a menu of services that include the names, positions and job functions of all personnel staff.	3	2	3	3	4	4	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	8
1.4 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function head is a member of the superintendent's cabinet and participates in decision-making early in the process.	4	0	4	6	9	10	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.5	<b>PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING</b> The personnel function has a data management calendar that lists all the ongoing data activities and responsible parties to ensure meeting critical deadlines on California Longitudinal Pupil Achievement Data System (CALPADS)/California Basic Educational Data System (CBEDS) reporting. The data is reviewed by the appropriate authority prior to certification.	2	3	4	6	6	6	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
3.8	<b>LEGAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</b> In merit system LEAs, recruitment and selection for classified service are in compliance with the rules of the personnel commission and all applicable requirements are followed. (EC 45240-45320)	1	1	2	4	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
3.9	<b>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</b> The personnel function has a recruitment plan based on an assessment of the LEA's needs for specific skills, knowledge, and abilities. The LEA has established an adequate recruitment budget. Job applications meet legal and LEA needs.	0	0	2	4	5	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
3.11	<b>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</b> Selection procedures are uniformly applied. The LEA systematically initiates and follows up and performs reference checks on all applicants being considered for employment.	2	2	4	6	8	9	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.12	<b>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</b> The LEA recruits, selects, and monitors principals with strong leadership skills, with a priority on placement of strong leaders at underperforming schools.	1	1	4	5	6	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
4.3	<b>LEGAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT</b> The LEA has developed a systematic program for identifying areas of need for in-service training for all employees. The LEA has established a process by which all required notices and in-service training sessions have been performed and documented such as those for child abuse reporting, blood-borne pathogens, drug and alcohol-free workplace, sexual harassment, diversity training, and nondiscrimination. (cf. 4112.9/4212.9/4312.9), GC 11135 EC 56240, EC 44253.7)	1	1	1	4	5	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7
4.4	<b>LEGAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT</b> The LEA's nondiscrimination policy and administrative regulations and the availability of complaint procedures shall be regularly publicized within the LEA and in the community, including posting in all schools and offices including staff lounges and student government meeting rooms. (cf. 4030, cf. 4031, G.C. 11135)	1	1	2	4	5	4	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
4.5	PROFESSIONAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT Initial orientation is provided for all new staff, and orientation materials are provided for new employees in all classifications: substitutes, certificated and classified employees.	0	2	2	4	7	8	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
4.6	PROFESSIONAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT The personnel function has developed an employment checklist to be used for all new employees that includes LEA forms, including acceptable use of technology and state and I-9 federal mandated information. The checklist is signed by the employee and kept on file. Employment Development Department reporting is compiled within 20 days of employment.	2	2	3	4	7	9	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
5.1	LEGAL STANDARD – OPERATIONAL PROCEDURES Regulations or agreements covering various types of leaves are fairly administered. (EC 45199, EC 45193, EC 45207, EC 45192, EC 45191) Tracking of employee absences and usage of time off in all categories should be timely and should be reported to payroll for any necessary salary adjustments.	3	3	4	5	7	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	7
5.4	LEGAL STANDARD – OPERATIONAL PROCEDURES Personnel files contents are complete and available for inspection. (EC 44031, LC 1198.5)	1	1	1	3	5	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	6



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.5	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Personnel nonmanagement staff members have individual desk manuals for all of the personnel functions for which they are held responsible, and the HR Department has a process for cross-training.	2	3	4	5	6	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7
5.7	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES The personnel function has procedures in place that allow for both personnel and payroll staff to meet regularly to solve problems that develop in the processing of new employees, classification changes, employee promotions, and other issues that may develop.	3	0	3	4	6	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	10
5.8	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Personnel staff members attend training sessions/ workshops to keep abreast of best practices and requirements facing personnel administrators.	1	1	2	3	5	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	9
5.10	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Established staffing formulas dictate the assignment of personnel to the various sites and programs.	3	2	3	3	4	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.11	<b>PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES</b> The LEA has implemented position control processes that incorporate the hiring and placement of all governing board-authorized positions. A reliable position control is a planning tool that has defined standards and formulas for tracking, adding, creating, and deleting positions within the organization to align staffing with budget and payroll systems.	2	1	3	4	3	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
7.1	<b>PROFESSIONAL STANDARD – USE OF TECHNOLOGY</b> An online position control system is utilized and is integrated with payroll/ financial systems.	2	2	4	4	4	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
7.2	<b>PROFESSIONAL STANDARD – USE OF TECHNOLOGY</b> The LEA provides professional development in the appropriate use of technological resources that will assist staff in the performance of their job responsibilities when need exists and when budgets allow such training. (cf. 4131, 4231, 4331)	4	4	4	4	6	8	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	9
8.1	<b>LEGAL STANDARD – EVALUATION/DUE PROCESS ASSISTANCE</b> Clear policies and practices exist for the regular written evaluation and assessment of classified (EC 45113) and certificated employees and managers (EC 44663). Evaluations are done in accordance with negotiated contracts and based on job-specific standards of performance. A clear process exists for providing assistance to certificated and classified employees performing at less-than-satisfactory levels.	0	2	3	4	4	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	5



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
8.3	<p>PROFESSIONAL STANDARD – EVALUATION/ DUE PROCESS ASSISTANCE</p> <p>Management has the ability to evaluate job requirements and match the requirements to the employee's skills. All classified employees are evaluated on performance at least annually by a management-level employee knowledgeable about their work product. Certificated employees are evaluated as agreed upon in the collective bargaining agreement and California Education Code. The evaluation criteria are clearly communicated and, to the extent possible, measurable. The evaluation includes follow-up on prior performance issues and establishes goals to improve future performance.</p>	0	0	0	1	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
9.5	<p>PROFESSIONAL STANDARD – EMPLOYEE SERVICES</p> <p>The LEA's Workers' Compensation unit is actively involved in providing injured workers with an opportunity to participate in a modified duty/return-to-work program. Updates are regularly provided to the cabinet.</p>	1	2	1	2	5	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7
10.2	<p>PROFESSIONAL STANDARD – EMPLOYER/ EMPLOYEE RELATIONS</p> <p>The personnel function provides a clearly defined process for bargaining with its employee groups that involves site-level administrators.</p>	0	0	3	5	7	7	8	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	9



Personnel Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
10.3	PROFESSIONAL STANDARD – EMPLOYER/EMPLOYEE RELATIONS The personnel function provides all managers and supervisors (certificated and classified) training in contract management with emphasis on the grievance process and administration. The personnel function provides clearly defined forms and procedures in the handling of grievances for its managers and supervisors.	1	1	2	3	6	8	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	6
10.4	PROFESSIONAL STANDARD – EMPLOYER/EMPLOYEE RELATIONS The personnel function has a process that provides management and the board with information on the impact of bargaining proposals, e.g., fiscal, staffing, management flexibility, student outcomes.	0	0	4	5	6	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7
Collective Average Rating		1.46	1.36	2.82	4.00	5.43	6.32	6.60	—	6.57	6.68



# **Pupil Achievement**







## 1.1 Planning Processes

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### Legal Standard

Categorical and compensatory program funds supplement and do not supplant services and materials to be provided by the LEA. (20 USC 6321)

### Findings

1. The district's CBO met with principals in April 2021 to begin the site-budget development process for 2021-22. The district provided written step-by-step instructions to the principals for line-item budget development that included each site's respective funding sources. The district disseminated a monthly budget monitoring meeting calendar for all schools. The 2021-22 budget meetings began in September 2021 and were held collaboratively with the CBO, the executive director of state and federal programs, representatives from the Educational Services Department, and each principal/site designee. However, not all sites attend their scheduled budget meeting, according to district interviews and document reviews. The district provided evidence of ongoing budget guidance to sites including a Title I Requisition Work Flow Chart, a Title I Allowable Usage Chart, as well as email memos related to budget transfer instructions.
2. Title I site budgets and budget reports reviewed by FCMAT indicated high percentages of unencumbered Title I funds as of December 11, 2021. The district reported this was because of the lack of requisitions submitted to the district by principals. Principals reported that the district expected sites to spend one-half of all site allocations each year by December 31.
3. A review of each school's SPSA indicates that the district spends Title I funds to supplement and not supplant services and materials provided by the district. However, FCMAT found it difficult to connect the schools' SPSA budgets with their actual site allocations and goals since many SPSAs included a general list of activities and strategies that were not directly linked to budget resource codes or budget lines. In addition, only a few SPSAs reflected that a comprehensive needs assessment had been done before the SPSA development.
4. The CDE regularly monitors the district for the appropriate use of federal funds through submitted reports and periodic on-site/online reviews. The district did not have any noncompliance findings related to categorical funds during its last Federal Program Monitoring (FPM) review. The district was scheduled for an FPM review the week of May 23, 2022.
5. The district developed an online Title I compliance monitoring system and implemented a Title I crate for each site to use to track whether specific Title I tasks were completed by their respective due date. It was not clear, however, whether the crates were monitored for compliance by the district.



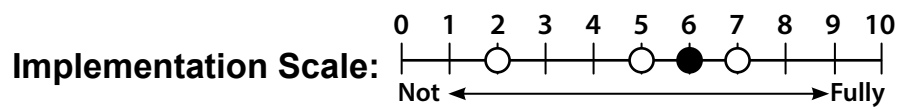
## Recommendations for Recovery

1. The district should create a comprehensive site budget procedures manual to guide principals in the development and management of site budgets with timelines and expectations for the use of general and categorical funds. The manual might include topics such as: the district's funding resources (LCFF supplemental and concentration (LCFF S/C), Title I, Title II, Title III, etc.), with a brief explanation of each resource's primary purpose, the allowable uses, budget timelines, and general district expectations for planning and monitoring. Train principals and any other site staff involved with budgeting on these procedures and monitor compliance. Annually review the manual and update, as needed.
2. The district should provide training for principals on how to connect SPSA strategies/ activities directly to a resource code or budget line.
3. The district should continue to review site requests for expenditures and carefully monitor them to ensure that categorical and compensatory program funds supplement and do not supplant services and materials to be provided by the district.
4. The district's CBO and executive director of state and federal programs should continue to regularly meet with principals to monitor the status of categorical funds throughout the year to ensure that they are spent in a timely and appropriate manner.
5. The district should continue to provide each school site with an online Title I compliance crate and ensure that each site is uploading documents, as required, and that the documents reflect a compliant Title I program.
6. The district should ensure that each school that receives Title I funds conducts a comprehensive needs assessment prior to their SPSA development that includes not only surveys, interviews and discussions, but also some sort of verifiable (qualitative or quantitative) data related to the actions included in the plan.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	5
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 1.2 Planning Processes

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### Legal Standard

Each school has a school site council, comprised of teachers, parents, principal and students, that is actively engaged in school planning. (EC 52050-52075)

### Findings

1. BP and AR 0420, both applicable to this standard, were last updated and approved at the April 2019 board meeting.
2. The schools continue to be inconsistent in their timelines for electing new officers to the SSC. The district SSC timeline provided the sites with guidance to elect officers in August/September each year. SSC minutes indicated elections occurred between September and January, with most elections occurring in January. FCMAT did not receive SSC minutes from four schools for this review period and could not confirm that officers were elected or that their SSCs met during this review period.
3. During this review period, FCMAT was provided with electronic copies of the 2020-21 SPSAs, which were approved by the county administrator at the February 24, 2021, board meeting. For the 2021-22 SPSAs, the district provided the 2020-21 plans and changed the year to 2021-22. A quick comparison shows that the plans are otherwise identical, including the approval dates by the SSCs and the board, as well as the total funds budgeted. At the December 15, 2021, board meeting, an item was presented to extend the 2021-22 plans through June 30, 2022. The agenda item notes that the plans are effective through February 24, 2022, and the extension would allow for the full 2021-22 allocated funds to be expended, while also allowing staff to align the 2022-23 plans to the fiscal year. This was an error since the plans extended were from 2020-21. At the March 17, 2022, board meeting, district staff partially corrected the error, and the revised item correctly requested an extension of the 2020-21 plans through the end of the fiscal year, although it failed to correct the inaccurate statement referencing the 2021-22 funding allocation. There are several issues with this action taken, and no updated plans were approved by SSCs or the county administrator for 2021-22. Since no updated plans were approved by SSCs or the county administrator for 2021-22, the action appears to extend the 2020-21 funding allocation and not the 2021-22 funding allocation. Therefore, federal funds allocated to the district for 2021-22 cannot be expended by school sites, and FCMAT was not provided with sufficient information to determine whether school sites received allocations for 2021-22 and do not have plans to allow for their expenditure, or no allocations have been made for the 2021-22 fiscal year. This could have serious implications on the district's federal funding.
4. Most schools used the district's SSC membership form to show the composition of their councils. The form outlines the composition requirements for elementary versus secondary SSCs and identifies each member and his or her title as well as the group he or she is representing. The district provided direction regarding SSC composition requirements in its SSC training, and this requirement is also explained in the SSC



handbook. Many SSCs had the correct composition of members as required by Education Code 65000, although seven SSC membership forms did not reflect the proper composition, with most having more staff representation than an equal number of parents, community members and students combined. Three schools did not provide SSC composition forms. Students were represented on all secondary school councils as required.

5. The district's SSC handbook contains SSC agenda and minutes templates. Some SSC minutes were published using the district's template, and some indicated the council's vote on agenda items. However, four sites did not provide SSC meeting minutes to FCMAT for review, and some sites still provide little to no detail in the minutes provided. Lack of detail makes it more difficult for those not in attendance to understand the discussions and actions of the council or the results of a council's vote on an action item. Some minutes and/or sign-in forms continue not to include an individual's membership representation, making it difficult to understand the composition of the quorum at each meeting.
6. The district provided an SSC training on October 13, 2021 addressing SSC bylaws, composition rules, Robert's Rules of Order, responsibilities of SSC members, a timeline of SSC tasks, the SPSA, and Title I expenditures. Although the district has provided direction and training, a review of SSC meeting minutes and interviews indicates various SSCs continue to perform their duties and responsibilities inconsistently between schools.
7. District direction is provided to site leadership, and a timeline of major SSC tasks was included in the SSC training and SSC handbook. However, the minutes provided for this review period indicate inconsistency across the district in the number of times each council meets, the level of review and input on the school plan, and data and budgetary information shared.
8. AR 0420 provides direction for each SSC to conduct a comprehensive needs assessment before developing the content of the SPSA. Certain principals reported their SSC was engaged in activities such as analyzing student data or conducting a comprehensive needs assessment, but FCMAT received limited SSC meeting materials that demonstrated this. SPSAs developed for 2020-21 were aligned with the district's LCAP.

## **Recommendations for Recovery**

1. While the district provided training and a handbook outlining SSC timeline requirements such as election of new members, composition requirements, number of meetings to be held, data and budgetary information needed to review, evaluation of accountability and Dashboard measures, and approval of SPSA in the required timeline, the district should hold site principals accountable to the SSC timeline requirements so there is consistency across the district.

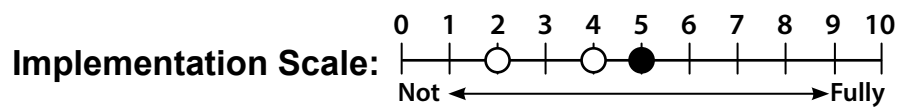


2. The district's SSC composition form should be modified to include the date the council was officially formed by electing members and officers, the terms to be served, and have a signature line for principals to certify that all the information is correct. This form should be due to the central office leadership no later than October of each year.
3. District leadership should establish quarterly dates for sites to turn in all SSC agendas and minutes for review and monitoring, giving the district the ability to validate that the council is composed of the requisite members, meets regularly, evaluates the effectiveness of programs and expenses under its purview, follows proper guidelines for meetings and is actively engaged in decision-making. Formal reviews should be periodically conducted throughout the year, and the district should provide additional assistance to schools that struggle to meet those requirements, focusing on those with new site leadership.
4. The district has adopted a standardized format for reporting SSC minutes, but should also require it to be used. In the initial SSC training each year, the district should stress the importance of the minutes being detailed enough for those not in attendance to clearly understand what took place. These should also be formally reviewed by the district periodically throughout the year, and the district should provide specific assistance to schools that struggle to meet the requirements established. Site administrators should be held accountable for meeting these district requirements.
5. The district should continue to provide annual district training to ensure that SSC members and principals fully understand their roles and are equipped to do their jobs effectively as members.
6. The district should continue to provide principals with district support on issues regarding the lack of parental involvement and lagging engagement. This support allows the councils to focus on developing and implementing their SPSAs in alignment with the district's Strategic Plan and LCAP.
7. The district should ensure the annual adoption of SPSAs by SSCs so that each school has a plan for spending its allocated funds, and each SSC is actively engaged in school planning.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 1.4 Planning Processes

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### Professional Standard

The LEA's policies, culture and practices reflect a commitment to implementing systemic reform, innovative leadership, and high expectations to improve student achievement and learning.

### Findings

1. The district continues to use its 2018-2023 Strategic Plan as its global guide to district improvement initiatives. Additionally, during 2021, the district outlined its instructional priorities for 2021-22 that originated with the IUSD Instructional Plan 2021-2023 as well as its MTSS Plan 2021-2024. Both plans were collaboratively developed by multiple educational partners and are detailed, action-oriented plans aligned to the Strategic Plan and the district's LCAP. The Instructional Priorities 2021-22 include the following three performance indicators: 1) A-G completion and graduation rate, 2) literacy performance (transitional kindergarten (TK)-2, ELLs, SWDs, and 3) special education (increase the percentage of SWDs in general education) with measurable goals and targets for students, teachers, leadership and the organization. The MTSS Plan details how the IUSD Instructional Plan 2021-2023 will meet the needs of all students and describes, by grade level and content area, the specific supports that should be provided for Tier 1 and Tier 2 academic interventions. Tier 3 academic supports have not yet been defined. The MTSS Plan also includes Tiers 1-3 prescribed interventions for behavior by grade span.
2. In collaboration with the LACOE and the CCEE, through the AB 1840 requirement, the district regularly monitors the implementation of its Strategic Plan and actions of its Instructional Priorities 2021-22 and MTSS Plan. The SIR progress monitoring tool was developed by CCEE and LACOE and is used for quarterly reviews with the district. This tool was designed around the Strategic Plan and is aligned to the district's LCAP goals and FCMAT standards. In general, the ratings from the most recent report dated March 2022 indicate that, although the district has developed and disseminated well-developed plans, it is in the early stages of implementation in most areas included in the report.
3. Most district-level administrative leaders had remained in their respective position since the last FCMAT review. However, several key Educational Services Department staff members have been in their positions for 1 1/2 years or less, and a few were new to the district or to their current position in 2021-22. Based on written feedback and verbal interviews, educational partners at all levels (district and site administrators, LACOE, teachers and other staff) continue to report an improved culture and climate throughout the district, with high confidence and trust in the district leadership team's ability to move the district forward. The district continues to have high turnover in teaching staff, which hinders the entire instructional program. Because of declining enrollment, the district is forced to provide layoff notices to many of its newly hired teachers, losing effective teachers to other districts as well as the investment made in training them. The district began the year with more than 30 teaching vacancies and had issues with acquiring substitute teachers. Therefore, the district's coaches were needed to serve as classroom



teachers, and some principals spent weeks serving as substitute teachers in addition to their administrative duties.

4. The district administration provided support and resources to principals to help them in aligning their respective SPSA with the goals in the LCAP and the Strategic Plan's key actions. Resources included a SPSA Checklist, a Plan Template, and a School Site Council SPSA Monitor/Review Template. The Plan Template and SPSA Checklist included components related to the measurable goals for each site, as well as the data for measuring goal attainment. The SPSAs reviewed by FCMAT had measurable, realistic goals based on verifiable data.
5. The district held biweekly principal meetings, which included routine district business, and consistently focused on collaboration, planning and professional learning intended to train principals to serve as instructional leaders. There were also several additional training opportunities outside the structured meeting time. Some of the topics for principal professional learning included the CoI implementation practices, MTSS including the identification of the core instructional program and designated grade-level interventions, the coaching of teachers, and digiCOACH classroom observation tool training with some calibration related to the walkthrough elements.
6. The district contracted with the New Leaders organization to provide leadership training and mentoring to principals and the Educational Services leadership. The New Leaders support includes eight training modules that focus on leadership theory and practice with topics that range from transformational leadership to planning for instructional excellence and equity to instructional leadership: corrective instruction, intervention, and acceleration. The district indicated that the primary goal for its contract with New Leaders is to strengthen the effectiveness of instructional leadership at all schools to fully implement the district's MTSS Plan.
7. In fall 2021, the district systematically introduced the principals to the digiCOACH classroom observation tool, which it had aligned to the 2021-22 instructional priorities. Full implementation of digiCOACH is planned for the 2022-23 school year, but principals were trained to use the tool and participated in some calibration of a single focus element using digiCOACH. Principals were also provided training in teacher coaching and feedback strategies. The district expects principals to conduct classroom observations using the digiCOACH tool and provide teacher feedback. However, a FCMAT review of the digiCOACH data provided indicated that two principals had not conducted any observations using the tool, and others had conducted 10 or less between the December rollout and March.
8. The district provided a variety of professional learning opportunities for district and site administrators as well as instructional coaches, teachers and site leadership teams. The focus areas for professional learning included: Culturally and Linguistically Responsive Teaching and Learning, MTSS, DIBELS, CoI, Elevation program and Positive Behavior Interventions and Supports (PBIS) program. The district administration and LACOE approved the service agreements for professional learning providers in accordance with AB 1840.



9. The district leadership communicates a commitment to high expectations and educational excellence through its equity principle, mission statement, its core beliefs outlined in its Strategic Plan, its MTSS Plan 2021-24 and its Instructional Plan 2021-23. Additionally, it has begun to model the process of full implementation of high-leverage strategies through its CoI activities related to graduation rates and TK-2 literacy. However, based on student assessment data in regard to both completion and outcome data, as well as classroom observations, and high school course failure rates, these commitments and high expectations are not yet producing results in most district classrooms.
10. The district continues to use the CPSEL as the criteria for principal evaluations. The executive directors of elementary and secondary education evaluate the principals of the schools to which they have been assigned. In addition to an initial meeting with each principal early in the year to discuss the evaluation process and set goals for the year, both executive directors stated they have monthly meetings with the respective principals assigned to them and complete a midyear review of progress as well as a summative annual evaluation. Although the district expects executive directors to visit their assigned sites monthly and conduct classroom walk-through observations with the site principal, monthly visits have been primarily conducted virtually in 2021-22.

## **Recommendations for Recovery**

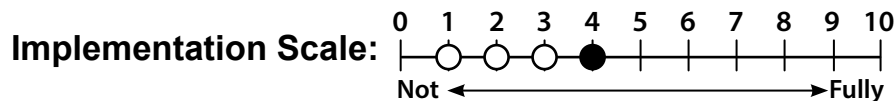
1. The district should continue to systematically implement the elements of the Instructional Plan 2021-23 that it has embedded into the digiCOACH classroom observation tool and ensure that principals participate in calibrating in regard to each element observed. Teachers should be provided with professional learning and a continuum of support to ensure they can demonstrate high effectiveness in implementing each element. The executive directors of elementary and secondary education should conduct site visits and classroom observations with the principals who are assigned to them. The district should monitor the digiCOACH data regularly to ensure principals observe teachers and provide effective feedback about the district's instructional priorities. Principals should be held accountable through the district's evaluation process if they do not adhere to the district's expectations.
2. The district should continue to systematically introduce and provide professional learning to staff at all levels, as appropriate, regarding the components of its MTSS Plan. Teachers should be provided a continuum of supports to fully implement the plan's components related to both academic and behavioral interventions, including the implementation of the PBIS program. Supports should include principal observations with effective feedback, coaching support, teacher collaboration by grade level or content area, collaboration with school counselors and others with expertise in specific areas of child behavior and development.
3. The district should continue to provide principals with professional learning and differentiated support to ensure they are the instructional leaders at their respective sites through both district-led professional learning and the New Leaders program.



4. The district should ensure principals are regularly and rigorously evaluated according to the schedule and CPSEL standard criteria established by the district, which includes student achievement. The district should also continue to monitor monthly school site behavior, attendance, and academic data and conduct CoI sessions related to district and school site data.
5. The district should continue to make a concerted effort to retain effective site leaders and teachers. The district should also develop a rigorous hiring process for new administrators to ensure that it hires only experienced, proven instructional leaders as principals and then provide support and coaching, as needed.
6. The district should continue the collaborative work with CCEE and LACOE to monitor the implementation of the district's Strategic Plan as well as the Instructional and MTSS plans. Continue to contract for support with external agencies/experts to provide expertise in areas where implementation is stagnant, and the district does not have the capacity.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 1.5 Planning Processes

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### Professional Standard

The LEA has fiscal policies and a fiscal resource allocation plan that are aligned with measurable student achievement outcomes and instructional goals including, but not limited to, the Essential Program Components. (Revised DAIT)

### Findings

1. BP 3000-Business and Non-Instructional Operations Concepts and Roles, adopted on August 4, 2014, and BP 3100-Business and Non-Instructional Operations Budget, adopted on February 20, 2019, both speak expressly to this standard.
2. The district continues to lack a separate fiscal resource allocation plan that is specifically aligned with measurable student achievement outcomes and instructional goals, including, but not limited to, the Essential Program Components. The district, City Honors and LaTijera adopted 2021-22 LCAPs on June 30, 2021. The district's LCAP also serves as the Local Education Agency (LEA) plan. FCMAT's review of the district's LCAP goals and actions found alignment between the LCAP and the district's Strategic Plan, and its 2021-23 Instructional Plan. In addition, the schools' SPSA goals were aligned to the district's LCAP actions and goals for improved student achievement.
3. Site principals reported attending regular meetings with staff in the Business Services Department to monitor site budgets during 2021-22. Monthly site budget meeting agendas addressed site budget questions, a resource-by-resource review, a review of the supplemental, concentration and Title I allocations, and a review of staffing changes (transfers, resignations, and new hires). Additionally, sites reported having met with the executive director of state and federal programs to discuss their individual site budgets. Principals reported receiving support with developing their site budget and SPSA. Resources provided to principals included a SPSA Checklist, a Plan Template, and a School Site Council SPSA Monitor/Review Template. The Plan Template and SPSA Checklist included components related to the measurable goals for each site as well as the data for measuring goal attainment. The SPSAs reviewed by FCMAT contained measurable, realistic goals based on verifiable data.
4. The district used an outdated template for its 2021-22 SPSAs. An updated school plan template, which renames the Single Plan for Student Achievement to the School Plan for Student Achievement (still known as the SPSA), has been developed by the CDE and was adopted for use in 2019.

### Recommendations for Recovery

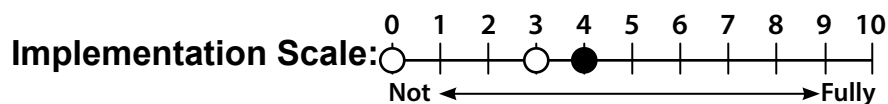
1. The district should continue to have principal representatives participate in the LCAP planning committee. They should report regularly to the entire group of principals at their monthly meetings and elicit their input as part of the planning process. This guarantees all sites have a voice in the process, even if they are not part of the planning committee.



2. The district should continue to ensure school site budget development and management that facilitates program implementation to support the goals in the LCAP, the Strategic Plan and SPSAs. This will maximize benefits for students.
3. The district should ensure that the executive director of state and federal programs, Business Services Department budget representatives and site principals continue to meet regularly throughout the year as a system for reviewing the site budgets and helping to make decisions that support the LCAP, Strategic Plan and SPSAs.
4. The district should periodically monitor SSC minutes throughout the year for site-level budget decisions and evaluation of program effectiveness, ensuring that adjustments are made as needed.
5. The district should use the updated CDE SPSA template.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 1.6 Planning Processes

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### Professional Standard

The LEA has policies to fully implement the State Board of Education-adopted Essential Program Components for Instructional Success. These include implementation of instructional materials, intervention programs, aligned assessments, appropriate use of pacing and instructional time, and alignment of categorical programs and instructional support.

### Findings

1. The district has multiple board policies that speak expressly to this standard such as BP 6161.1 and 6161.11.
2. The district continued to implement its Strategic Plan for 2018-2023. In addition, the district developed plans that provide the scope and detail for how it will achieve its Strategic Plan goals. These additional plans are coherent and include the MTSS Plan, the English Learner Plan, and the Instructional Program Plan 2021-23. All the SBE-adopted essential program components are included under the comprehensive structure of the Strategic Plan.
3. The district provides standards-aligned, board-adopted curriculum in English language arts (ELA), mathematics, science, and social science to its teachers. High school curricular offerings in some A-G requirements, such as visual and performing arts and CTE pathways, continue to be limited due to the small size of the district's high schools. During FCMAT classroom visits, team members observed teachers and students using the district-adopted instructional materials.
4. The district created and implemented a comprehensive assessment calendar in collaboration with teachers and principals. This calendar includes district benchmark assessments administered three times during the year (i-Ready, DIBELS, and Achieve 3000, depending on grade level and content areas). Additionally, the district provided assessment options to be selected by school sites and/or grade level/content areas that would be used for formative assessments at the classroom level. The district provided evidence of benchmark assessment data reviews for the beginning of the year and midyear assessments. However, FCMAT found completion rates for the defined benchmark assessments to vary across the district with some sites well below the district's expectation of 95% completion. Additionally, the effective use of instructionally embedded formative assessment in classrooms to guide instruction/intervention was observed at only two school sites in the district.
5. Teachers are provided some collaboration time during staff meetings if the schedule permits, which is rare based on teacher interviews. Teachers generally are required to designate collaboration time as they can. Each school and grade span developed its own plan for collaboration that may have included teachers meeting during prep periods, or another staff member taking a grade level of students for physical education or an activity. During 2021-22, rotating substitutes were not available due to the high demand



throughout the area. District administration reported that it is working with the ITA regarding “bank time” for all schools in the district so that it can provide systematic collaboration time for teachers in 2022-23.

6. Although the district developed a strategic MTSS Plan, teachers and other staff have not yet been introduced to it with formal professional learning. Therefore, the district does not provide systematic intervention during the instructional day as recommended by the California State Frameworks in mathematics and ELA and as stated in its LCAP. The district contracted with Hey Tutors to provide pull-out or push-in support for a few students during the day and provide some after-school tutoring. Many sites also fund an intervention teacher with their Title I funds to work with identified students, but how those teachers are used varies by each site. High school students in need of credit recovery have the Apex program available. Evidence of Tier 1 classroom interventions varied between sites and classrooms. Lesson plans reviewed throughout the district were inconsistent in the degree of planning with intentionality to include effective instructional strategies, rigor, and Tier 1 interventions into the lessons. The i-Ready Program is primarily used throughout the district for Tier 2 intervention for grades K-8 and Achieve 3000 for grades 9-12. The district noted that its plan for systematic Tier 2 implementation is scheduled for fall 2022. The district does not have an articulated plan for its Tier 3 intervention, but it is scheduled to begin work on it after the first semester of 2022-23.
7. The district has not adopted an SBE-approved intensive-level reading intervention program, as described in the California ELA Framework, for grade 4-8 students who are two or more years behind grade level.
8. FCMAT reviewed all the SPSAs. Based on this review, the alignment of categorical funds with instructional support could not always be ascertained because many of the SPSAs included general lists of activities that were not specifically aligned to a budget source.

## **Recommendations for Recovery**

1. The district should continue to make the components of its Instructional Plan 2021-23 a priority for implementation throughout the district, ensuring that teachers and principals receive a continuum of professional learning and supports that lead to full implementation (research recommends at least 90% of teachers using the components at least 90% of the time). Principals should be held accountable for conducting classroom observations as directed by the district. The executive directors of elementary and secondary education should conduct classroom observations with the principals assigned to them, providing coaching support to address any instructional deficiencies at the school site. In addition, the district should develop written guidelines and expectations for teacher lesson plans. These guidelines should be aligned with the district's instructional priorities and should help ensure that teachers build lessons with intentionality to include high levels of depth of knowledge (DOK) questions, student collaboration, and effective Tier 1 strategies such as checking for understanding throughout the instructional process.

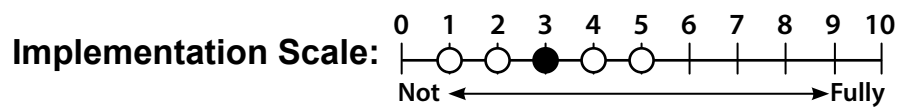


2. The district should provide a continuum of supports to grade-level /content area teacher teams to conduct lesson studies to assess the rigor of planned/delivered lessons and student assignments in relation to state standards and adjust them accordingly. The supports should include the use of instructional coaches.
3. The district should implement and monitor the district's plan for MTSS, for both academic and behavior issues. This would include clearly defining Tier 2 and Tier 3 academic interventions.
4. The district should monitor the effective use and implementation of the i-Ready program to ensure that it is strictly used as designed. This includes ensuring that all students in need of Tier 2 intervention are provided the recommended time every week and that all components of the program are used with teacher/aide supervision and guidance.
5. The district should continue to provide training to teachers in the district's adopted ELA and mathematics curriculum materials so that they can effectively use all components of the material to provide Tier 1 interventions in the regular instructional program. Ensure that all teachers use curriculum-embedded formative assessments during the instructional process to appropriately reteach, as needed, based on student understanding.
6. Principals should be held accountable for ensuring that the appropriate pacing of instruction and the administration of assessments are occurring as directed by the district and that 95% of students participate in each assessment.
7. The district should continue to provide teachers and principals with ongoing training and support in using data from assessments to monitor, adjust, and individualize instruction consistent with the Common Core State Standards (CCSS) and the MTSS process. The district should also continue to provide systematic training to teacher teams on the CoI process. District and site administrators should support and monitor collaboration time to ensure that teams use these practices as they work to improve their instruction to meet student needs.
8. The district should require schools to delineate actions, aligned to goals in their respective SPSAs that include specified dollar amounts and funding sources. All SSCs should also be required to authentically evaluate the effectiveness of the individual actions in their SPSAs. For example, if a SPSA includes an action for intervention with funding for a software program, the SSC should review data related to the effectiveness of the intervention provided during the year.
9. The district should provide systematic teacher collaboration time throughout the district.
10. The district should adopt an SBE-approved intensive-level reading intervention program, as described in the California ELA Framework, for grade 4-8 students who are two or more years behind grade level.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	5
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 1.8 Planning Processes

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### Professional Standard

The LEA provides and supports the use of information systems and technology to manage student data, and provides professional development to site staff on effectively analyzing and applying data to improve student learning and achievement. (DAIT)

### Findings

1. The district has a new executive director of IT. In IT, the district has established a database administrator and a director of educational technology. The executive director participates in weekly Educational Services meetings and attends principals' meetings. This provides opportunities for frequent communication and collaboration about the management and dissemination of student data. The executive director of IT continues working to strengthen the district technology infrastructure and information systems to provide accurate and timely student data to the LEA.
2. The district coordinator of assessment and instructional technology left the district at the end of 2021 and her responsibilities have been divided between multiple individuals. Given the other responsibilities of the individuals assigned assessment duties, maintaining and monitoring a cohesive assessment system has been difficult. District administrators expressed an intent to address the need for a dedicated district-level assessment staff person in the future. The process for selecting site testing coordinators is being revised, and meetings between district assessment staff and site testing coordinators are not being held.
3. The district has developed a draft Technology Plan that is soon anticipated to be board-approved. The draft plan elements are aligned with the district's Instructional Plan, Strategic Plan, Theory of Action, and LCAP documents. Goals and objectives in the draft Technology Plan address the use of data by teachers and administrators to inform instructional decision-making and increase student achievement.
4. The district assessment calendar continues to require the use of technology-based i-Ready assessments, CAASPP summative assessments, ELPAC, DIBELS and Achieve 3000. Professional learning has been provided to principals and teachers in past years on how to access the systems for these technology-based assessments. There continues to be minimal evidence that the full range of technology-based data reports, tools, and resources for analysis and instructional planning available from these assessments are regularly used to guide classroom instruction.
5. The district Instructional Plan, Strategic Plan, and LCAP include goals and action steps related to implementation of a districtwide, data-based CoI process for data analysis and action planning. A common data analysis process and template have been selected by the district for districtwide use. Evidence indicates professional learning experiences for the CoI process have been primarily focused on the procedural elements in a workshop format. Most of the sample completed individual and team CoI forms submitted to



FCMAT lacked measurable action steps to address specific student learning needs identified through the data review process.

## **Recommendations for Recovery**

1. Continue to monitor the management and accuracy of student information through collaboration between the district IT staff and the Educational Services team.
2. Identify one individual to implement the educational duties related to state and locally required assessments for the district. Provide professional learning for the selected individual, as appropriate to need, to ensure he or she uses the best practices for interpreting, analyzing, and presenting assessment data accurately and in an understandable format.
3. Accelerate efforts to address the goals and action steps in all district plans related to the use of data to increase student achievement, including those requiring additional professional learning.
4. Continue to frequently and explicitly communicate district expectations to principals and teachers concerning the analysis of student achievement data and the use of this information in guiding instructional planning and the delivery of high-quality, data-driven instruction.
5. Continue to develop the common data analysis district process and template for use at all school sites by grade level/department teams. Moving beyond the procedural, workshop level, provide additional hands-on, guided practice professional learning on the effective use of the process embedded in the district-provided template. In the professional learning activities, emphasize depth of implementation, including the identification of specific, measurable instructional goals and action steps to address student needs determined through the analysis of student performance data. Regularly monitor the quality of implementation of the CoI process and work products generated through the process at all levels of the system.
6. Hold principals and teachers accountable for using the assessment data provided by the district to identify individual student learning needs targeted to specific content standards or clusters of standards and for developing and implementing measurable instructional goals and action steps to address those needs. Site principals should monitor the implementation and progress monitoring components of instructional action plans, with support from the executive directors of elementary and secondary education.
7. Continue to provide principals with ongoing professional learning opportunities that strengthen their ability to use short-cycle formative assessment data, as well as district and state summative assessment data, to inform instructional and curricular decisions at the school sites. Include specific strategies/techniques for coaching teachers in the analysis of student achievement data that results in the development and implementation of explicit,

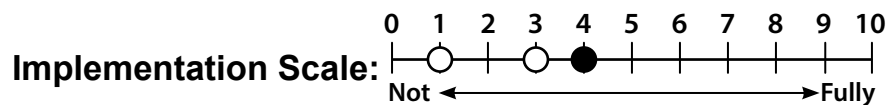


measurable instructional goals and action steps to design and deliver high-quality, data driven instruction.

8. Provide ongoing professional learning for teachers to increase the depth of their capacity to analyze the variety of reports available from district required assessments and to use the tools and resources provided in the assessment programs to develop and implement explicit, measurable instructional goals and action steps to address student learning needs.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 1.9 Planning Processes

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### Professional Standard

The LEA holds teachers, site administrators, and LEA personnel accountable for student achievement through evaluations and professional development.

### Findings

1. Principals reported, and evidence provided by the district indicated, that principals conduct their respective teacher and classified staff evaluations as directed by the district's policies. Teachers are evaluated based on the CTSP. The district continued in 2021-22 to convene a certificated evaluation development committee to revise the evaluation process and documents that are used for teacher evaluation.
2. All classified and certificated managers are to be evaluated in 2021-22, based on a memo provided by the district's HR Department. Principals and certificated managers are evaluated based on the CPSEL standards.
3. Article XVI-Evaluation Procedure of the ITA contract includes verbiage such as the following: "... the principle objective in evaluation is to improve the quality of education in the District," and also states that "... (student assessment) data is to be considered and used solely as a formative assessment tool to inform and shape adjustments to the instructional strategies..."

However, BP 4115 states the following:

The Superintendent or designee shall assess the performance of certificated instructional staff as it reasonably relates to the following criteria: (Education Code 44662)

Students' progress toward meeting district standards of expected achievement for their grade level in each area of study and, if applicable, towards the state-adopted content standards as measured by state-adopted criterion-referenced assessments.

There continues to be a discrepancy between the district's BP 4115 and ITA contract Article XVI in the use of student assessment data in the evaluation process of certificated staff. In addition, it is unclear how any assessment data are used in the formative assessment process by teachers. A review of the certificated evaluation form as well as the Certificated Employee Handbook indicated that neither included any reference to student achievement or student learning.

4. Documentation provided, as well as interviews conducted with site and district administrators, indicated that evaluation of instruction to improve teaching and learning had not been systematically implemented throughout the district at the time of the FCMAT review. Many principals were required to serve as substitute teachers for several weeks during the first semester of 2021-22. The district reintroduced the digiCOACH



classroom observation tool in fall 2021 to create districtwide observation standards aligned to its instructional priorities. However, the digiCOACH usage report dated March 2022 indicates that not all principals have used it as directed by the district, so baseline implementation data has not yet been established. In addition, the principal feedback to teachers reviewed by FCMAT varied in effectiveness.

5. Principals have participated in several professional learning opportunities throughout the 2021-22 school year. Some of the district's initiatives for the year, such as MTSS and the Instructional Priorities, were shared with principals during staff meetings and other trainings with the expectation that they would share the information with and train their staff in those areas. However, FCMAT found inconsistencies in the degree of training provided to site staff by the principals. The district met with representatives from its paraprofessional staff who requested that the district provide some professional learning directed at their needs to better support classroom teachers and students. The district developed a partnership with El Camino College to provide half-hour sessions every two weeks for the district's paraprofessionals. Those involved in the program indicated it was worthwhile and informative.

## **Recommendations for Recovery**

1. The district should ensure that a tone of accountability and high expectations for all staff continues to be a priority. The district should obtain baseline implementation data from the digiCOACH reports as it incrementally implements each of its instructional priorities. The district should then regularly monitor (at least quarterly) the degree of implementation throughout the district, supporting principals, as the data indicates.
2. The district should continue to ensure that principals are regularly and rigorously evaluated according to the schedule and criteria established by the district. This evaluation should include a determination of each principal's instructional leadership skills for improving instruction and student achievement. The elementary and secondary executive directors should, at a minimum, meet monthly with their assigned principals to collaboratively conduct classroom observations and then hold quarterly conferences with them to set and review metrics and progress and provide guidance and assistance, as needed.
3. The district should ensure that all district administrators, including executive directors, have performance evaluations that include specific goals or growth targets related to the Strategic Plan and/or the current year's Instructional Plan.
4. The district should continue to review options for restructuring the teacher evaluation process to more clearly focus on student achievement and the teachers' approach in fostering achievement, with an explicit connection between teaching and learning. The district should work with grade level leaders to identify and select achievement criteria relevant to their grade level. These criteria could range from growth in reading fluency based on DIBELS data to performance on a particular benchmark or a locally developed, standards-aligned performance task. Each grade level should then identify and set

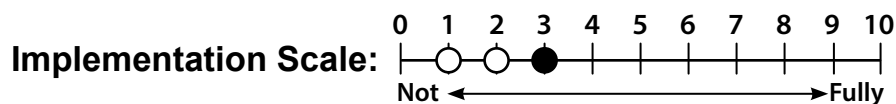


achievement targets for all teachers in a particular grade level. Teacher performance on student outcomes should become, at minimum, discussion points during the formative evaluation process if not part of the formal evaluation itself.

5. The district should continue to work with the bargaining unit to implement systems of support for teachers that include referrals by principals for instructional coach support, in addition to teacher request, so that principals have a full range of means to support teachers and increase their effectiveness to improve student achievement using the formative evaluation process.
6. The district should continue to collaborate with educational partner groups in the development of a professional learning plan for 2022-23 that is focused on the goals and objectives related to the MTSS and Instructional Priorities plans. The district should develop a systematic protocol that ensures principal professional learning translates into professional learning for teachers and observable improvement at the classroom level. The district should then monitor the implementation stages and provide support to sites, as needed, and hold principals accountable for implementation. The district should also continue to collaborate with its paraprofessional staff in the development of professional learning opportunities focused on their specific needs.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	3





## 2.1 Curriculum

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### Legal Standard

The LEA provides and fully implements SBE-adopted and standards-based (or aligned for secondary) instructional textbooks and materials for all students, including intervention in reading/language arts and mathematics, and support for students failing to demonstrate proficiency in history, social studies, and science. (EC 60119, DAIT)

### Findings

1. As noted in Standard 1.6, the district provides SBE-adopted instructional materials for grades TK-8 and standards-aligned curriculum for grades 9-12 in all content areas related to Education Code 60119, including ELD. The district continues to lack SBE-adopted materials in ELA for students in grades 4-8 in need of intensive intervention as defined by the California State ELA Framework for students who perform more than two years below grade level. The district's MTSS 2021-24 plan outlines district-approved Tier 1 and some Tier 2 curricular and program interventions.
2. FCMAT observed classrooms at every school in the district during its review. In general, school sites were orderly, and classrooms had the district-approved instructional materials to meet the needs of students, including ELLs and SWDs except for an SBE-adopted ELA curriculum for grade 4-8 students in need of intensive intervention. Some classrooms were observed to have supplementary materials that were not approved by the district.
3. While the district's MTSS 2021-24 plan includes academic interventions for Tier 1, as well as some district approved interventions for Tier 2 by grade level/content areas, Tier 3 is not yet developed. Since the district is in the early stage of implementation and teachers have not been provided in-depth training in the plan, the use of Tier 1 instructional interventions was observed to be inconsistent throughout the district. Tier 2 interventions primarily used include i-Ready, Achieve 3000, and Imagine Learning for ELLs. The high schools have and use the Apex Program for credit recovery.
4. The district contracted with the 95% Group to provide professional learning and support to sites with grades K-2 for literacy instruction. This action is in direct alignment with the district's instructional priority #2 (literacy performance). In addition, some schools in the district adopted the Systematic Instruction in Phonological Awareness (SIPPS) program to support the teaching of decoding skills in Tier 1 instruction as well as for Tier 2 intervention for K-2 students.



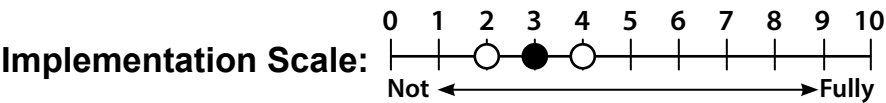
## Recommendations for Recovery

1. The district should intensify site monitoring to ensure effective, rigorous first instruction occurs daily throughout the district and that its instructional priorities and classroom expectations are fully implemented. The district's elementary and secondary executive directors should be on school sites at least monthly to conduct classroom observations with the principals.
2. The district should continue to systematically introduce and implement its MTSS 2021-24 plan. Implementation should include providing a continuum of professional learning for teachers that ranges from workshops, to coaching support, the observation of other teachers, coplan/coteach, as well as teacher grade-level or content area collaboration.
3. The district should select, adopt, and implement intervention curriculum (SBE-adopted Program IV) materials for grades 4-8 students who require intensive intervention in ELA. Mathematics intervention materials should be provided according to California Mathematics Framework recommendations. In addition, the district should ensure all sites incorporate appropriate intervention time during the regular instructional day based on California State Framework recommendations.
4. The district should continue to work with principals and teacher teams to ensure the advancement of student-centered instructional materials and strategies that are fully aligned with and reflect the rigor of the CCSS. Ensure that principals and teachers are informed of and adhere to the district's guidelines for the use of supplementary instructional materials. Provide professional learning for teachers in teacher teams to evaluate student work products and to calibrate student assignments and instruction to the California State Standards. Create and provide grade-level writing rubrics for each writing genre and ensure that teachers and students understand what proficient, grade-level writing includes.
5. The district should monitor the effectiveness of the site intervention programs based on student achievement data and determine if the programs and strategies used support the goals of the district to improve student achievement.
6. The district should evaluate the effectiveness of implementing the 95% Group's strategies for literacy instruction and SIPPS for phonological awareness and decoding skills. If the evaluations show these programs to be effective, the district should consider implementing for districtwide use.



**Standard Partially Implemented**

July 2013 Rating:	4
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating	3
July 2018 Rating:	3
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	3





## 2.3 Curriculum

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### Professional Standard

The LEA has planned, adopted and implemented an academic program based on California content standards, frameworks, and SBE-adopted/aligned materials, and articulated it to curriculum, instruction, and assessments in the LEA plan. (DAIT)

### Findings

1. The district's most recent board-approved LCAP also serves as the LEA plan. FCMAT's review of the district's LCAP goals and actions found alignment between the LCAP and the district's Strategic Plan, and its 2021-23 Instructional Plan. In addition, the schools' SPSA goals were aligned to the district's LCAP actions and goals for improved student achievement. However, FCMAT found that the district's implementation of the instructional components of the Strategic Plan continue to be in the initial stages of implementation.
2. FCMAT did not see evidence of the ELA or mathematics pacing/instructional guides that had been in used in 2020-21. However, based on interviews with various staff in the district, the district made a concerted effort to strategically design an assessment system that could improve student learning if fully implemented by teachers throughout the district. The district, in collaboration with its teachers and principals, created and implemented an Assessment Plan for 2021-22. This plan aligns with the district's MTSS Plan and includes universal screening for Tier 1 students three times a year based on benchmark assessments related to either DIBELS, i-Ready or Achieve 3000, depending on the grade span of students. The Assessment Plan includes a schedule for the administration of benchmarks and district-approved formative assessment options. Schools or grade spans or content areas can select from these options to use for the CoI process during teacher collaboration time.
3. The district continues to have assessment completion data that indicates high percentages of students do not take or do not complete the district's benchmark assessments, as outlined in its Assessment Plan. Upon review of the district's most recent midyear assessment data, FCMAT found that completion rates varied by site and by grade in sites. In addition, FCMAT found that samples of the district's CoI process related to achievement data did not include disaggregated data for ELLs or SWDs, which are two of the district's high priority groups based on its LCAP and for which FCMAT found that reports can be obtained.
4. The district's ELA program, including curriculum and instruction, is not in alignment with the California Frameworks in ELA regarding providing an intensive intervention program for grade 4-8 students as noted in Standard 2.1.
5. As noted in its Strategic Plan, effective first instruction continues to be a focus of the district. However, recent district benchmark assessment data, as well as the high course failure rate of high school students from the first semester of 2021-22 indicates that a high percentage of students need Tier 2 and 3 interventions.

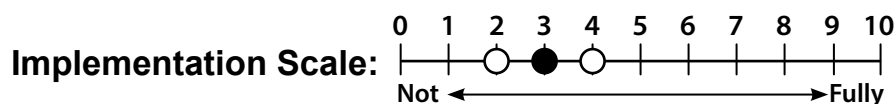


## Recommendations for Recovery

1. The district should fully align the district's LCAP with the needs of district students. As previously noted in Standard 2.1, the district should implement an intensive intervention for ELA and mathematics as detailed in the recommendations in the California Frameworks.
2. The district should continue to increase efforts at the site and grade-specific levels to incrementally provide a continuum of focused professional learning to teachers and principals designed to improve effective first instruction, as defined by the MTSS and instructional plans, based on quantitative baseline data of classroom observations from digiCOACH.
3. The district should continue the work of the Educational Services assessment task force to monitor the effectiveness of the Assessment Plan 2021-22 and revise the plan, as necessary for 2022-23. The district should ensure all sites administer assessments as detailed in the district plan, and the executive directors of elementary and secondary education should hold their respective principals accountable for this process. In addition, the district and school sites should always disaggregate data for significant subgroups when the data is available to help support the MTSS process.
4. The district should continue to ensure that principals are trained in coaching strategies for teachers as well as in a continuum of district procedures for teacher support and continual improvement.

## Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 2.4 Curriculum

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### Professional Standard

The LEA has developed and implemented common assessments to assess strengths and weaknesses of the instructional program to guide curriculum development.

### Findings

1. The district Instructional Plan, Strategic Plan and LCAP include goals and action steps related to the implementation of common assessments to monitor student outcomes and assess strengths and weaknesses of the instructional program to guide curriculum development.
2. A districtwide system of required common assessments is in place. The district developed and published a 2021-22 assessment schedule that communicates clear expectations regarding which common assessments are required to be administered at each grade level/content area and the timeline for that administration. In response to previously expressed site administrator and teacher concerns about district assessment requirements, staff input was gathered by the CAO, and the input is reflected in the current assessment schedule. i-Ready, DIBELS (K-2) and Achieve 3000 assessments are expected to be administered three times during the academic year as described in the assessment schedule. The district goal is for 95% of students at each grade level/content area to complete the required assessments.
3. A September 8, 2021 memo from the CAO titled Implementation of Assessment and Student Progress was distributed across the district. The memo included information on the background of each state and locally required assessment. The memo also indicated that the purpose of assessments, both state and local, is to improve instruction and to provide feedback to staff and students. The CAO also developed a short video to discuss the key points included in the memo. Principals were expected to view the video with staff and discuss the contents of the memo to ensure that all instructional staff understand the purpose of required assessments and district expectations for implementation of the assessment schedule.
4. Staff indicated there was wide variation between sites in how the Implementation of Assessment and Student Progress memo and video were shared with teaching staff. Some teachers reported that they received the memo through email and did not see the video. Other teachers indicated that they participated in full staff discussions of the content of the memo and video.
5. Educational Services staff continue to review completion rates for the required assessments. During the 2020-21 school year, low completion rates for required assessments was identified as a concern by the Educational Services team. They discovered a wide variance in the number and percentage of students completing assessments between classrooms and schools across the district, and between completion rates on beginning of year, midyear, and end of year assessments within grade levels. As noted



above, a goal of 95% completion for required assessments was established. This goal continues in place for the 2021-22 school year.

6. District-provided data indicate completion rates for required assessments continue to be a problem of practice across the district. For example, i-Ready beginning of year assessments for 2021-22 showed a completion range between grade levels from 49% to 91%. DIBELS beginning of the year assessment had a completion range between grade levels of 72% to 81%.
7. Data summaries for required district assessments were presented at Educational Services and principal meetings multiple times throughout the school year. Summary presentations did not always include disaggregated data for significant subgroups. Results were generally displayed using percentages of students at different levels of performance. The number of students represented by those percentages was not included in the presentation graphs, which may give an incomplete picture of student progress when the number of students completing the assessment declines over time. For example, when presenting two-year comparison data for a particular grade level, one presentation slide indicated that 642 students were tested in one year with 18% (116 students) nearly meeting or meeting standards. The following year only 476 students were tested and 18% (86 students) nearly met or met standards.
8. No evidence was submitted to FCMAT documenting conclusions drawn or measurable curricular or instructional action steps formulated following discussion of the data summaries presented to administrators as described above.
9. The district assessment schedule requires six site-based/grade level specific formative assessments to be administered within set time frames throughout the year. Grade level teams can select from core curriculum assessments or Smarter Balanced interim assessments to meet this requirement. Written surveys indicated that curriculum assessments are sometimes used to identify students for intervention. No other evidence was provided on the full implementation of the formative assessment requirement.
10. There is minimal evidence that the wide variety of data generated from the required common assessments is systematically used for assessing program effectiveness and guiding curricular decision-making at the district, site, or classroom levels. The CCEE quarterly review process does address strengths and weaknesses of the district continuous improvement actions, but does not provide detail about the curricular program based on student assessment data.

## **Recommendations for Recovery**

1. The district should fully implement the goals and action steps included in the Instructional Plan, Strategic Plan and LCAP related to common assessments, with a focus on appropriate use of the data generated by those assessments, to strengthen the district curricular and instructional programs.

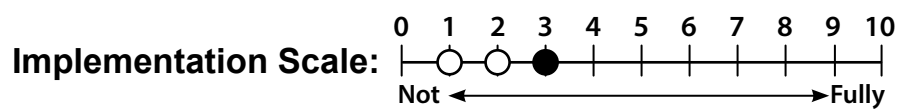


2. The district should utilize a formal Educational Services CoI process for in-depth district-level analysis of common assessment data to identify strengths and weaknesses of the curricular and instructional program. Implement this process to analyze district-level data from required assessments to determine which content standards/assessment targets students meet and which they do not, and to review academic progress for all district significant subgroups. Develop, implement, and monitor evidence-based, measurable district-level goals and action steps to strengthen the curricular and instructional programs to meet specific, standards-based student learning needs identified through this process.
3. The district should allocate time during principals' meetings to use the CoI process to identify specific strengths and weaknesses of the curricular and instructional programs based on student performance data. Use the full range of data available for completed assessments (e.g., item level, subgroup data, specific standards data, DOK information). Collaboratively establish measurable goals and action steps to address identified curricular and instructional needs at the site level. Monitor progress toward achieving those goals and adjust actions as necessary.
4. The district should continue to communicate the importance of all students completing district required assessments and to monitor completion rates for each required assessment to strengthen the accuracy and reliability of the assessment results. Identify barriers/challenges for teachers and students to completing the required assessments within the set time frame and problem solve to address the barriers/challenges. Provide principals and teachers with guidance and support, as appropriate to individual need, to meet all requirements and timelines and hold them accountable for completion of assessments.
5. The district should refine/expand data analysis displays to include subgroup data whenever available, particularly for ELLs and SWDs since these subgroups are the focus of two of three district priorities. In addition, include the number of students represented by reported percentages to minimize the potential negative impact on the interpretation of assessment results due to the variation in the numbers of students completing assessments within and between years.
6. The district should continue to review the implementation of the district assessment schedule periodically and revise as needed to support full implementation of an efficient, effective balanced assessment system that meets the information/data needs of all those affected (district administration, principals, teachers, students, parents, and community).
7. The district should provide principals and teachers with intensive, ongoing training on the full range of tools and resources provided with each of the district required assessments (e.g., analysis tools, item level data, DOK information, hand scoring guides and protocols, grouping tools, CAASPP Tools for Teachers). Move beyond procedural, workshop training and include a continuum of learning experiences (e.g., demonstrations, guided practice, structured professional learning community/CoI embedded analysis and planning activities) that require analysis of relevant data to determine which content standards/assessment targets students meet and which they do not. Develop, implement, and monitor site and classroom evidence-based, measurable goals and action steps to address identified weaknesses of the standards-based curricular and instructional program.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 2.5 Curriculum

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### Professional Standard

The LEA has adopted a plan for integrating technology into curriculum and instruction at all grade levels to help students meet or exceed state standards and local goals.

### Findings

1. The district provided a draft Technology Plan 2020-24 for FCMAT review that was close to being board-approved at the time of the FCMAT visit. The district also included components of the draft Technology Plan in the Strategic Plan and invested \$7 million in its infrastructure and tech support, as delineated in its most recent LCAP Annual Update. In February 2022 the district separated its IT Department into two departments, including Educational Technology to better support efforts to include technology in the instructional program. However, the district reported that IT staff turnover has been an issue for more than a year, and IT maintenance and staff support has been difficult. The district reported several vacant positions related to IT at the time of the FCMAT review.
2. The district reported that the IT Department that reports to the director of fiscal services now meets weekly with the Educational Services Department, which includes the director of educational technology, and strengthens collaboration and communication between the two departments.
3. The draft Technology Plan provided to FCMAT stated: “By June 2022, 50% of students will demonstrate grade-level aligned information literacy skills in support of demonstrating mastery of embedded technology,” and “100% of students will create projects using technology resources. These projects will evidence students’ proficiency in ELA, Mathematics, and Science and EL growth targets.” In addition, the plan stated the district will “Ensure that all teachers utilize technology consistently and transparently in planning and designing lessons, delivering instruction, and assessing and analyzing student learning in alignment with and to exceed the state content and ISTE standards.” Although the effective integration of technology with instruction was a component of some of the classroom walk-throughs conducted by FCMAT, there was little evidence that students use technology for collaboration, research or other instructional purposes besides accessing instruction, taking assessments and word processing.

### Recommendations for Recovery

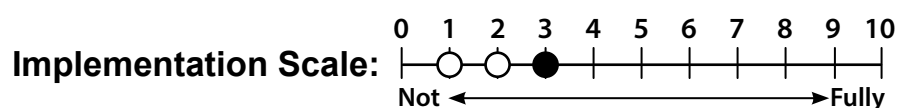
1. The district should finalize and obtain board approval of the draft Technology Plan 2020-24. Continue to ensure that the district has a Technology Plan that is aligned with its Strategic Plan and includes systematic strategies for embedding technology into the instructional program and into the hands of students. The district should continue to review options for providing a continuum of professional learning to teachers regarding the use of technology and information literacy for students with the expectation that teachers would implement those new strategies into their daily instruction.



2. The district should continue to assess whether the district has internal capacity to fully implement its draft Technology Plan. This assessment should include an analysis of its structure for providing technology professional learning, coaching and user support. The district should also continue to strive to fully staff and retain all IT positions.
3. The district should ensure that teachers and principals understand the California State Framework model regarding the full implementation of technology integration. Monitor classroom instruction using the digiCOACH walk-through tool regarding instructional use of technology and continue the collaboration between the IT and Educational Services departments.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 3.1 Instructional Strategies

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### Legal Standard

The LEA provides equal access to educational opportunities to all students regardless of race, gender, socioeconomic standing, and other factors. The LEA's policies, practices, and staff demonstrate a commitment to equally serving the needs and interests of all students, parents, and family members. (EC 51007)

### Findings

1. A review of district policy, professional learning opportunities, and interviews with district staff continue to indicate that most students are provided with equal access to educational opportunities regardless of race, gender, socioeconomic standing, and other factors.
2. Board policies continue to demonstrate a commitment to equally serving the needs and interests of all students, parents, and family members.
3. School sites report that they continue to strive to consistently demonstrate the commitment to equally serving the needs and interests of all students, parents, and family members.
4. Evidence at the district level and all school sites indicates that initiatives are in place to include parents and all those affected in the decision-making processes, as well as include parents and those affected in the life of the school.
5. Some schools have intentional systems for identifying and remediating instruction for students with identified instructional needs, but the variation among sites continues to result in inequitable access for all students. Although the district has a process and plan for MTSS, implementation varies among school sites.
6. The district has a detailed plan for the delivery of daily, designated ELD targeted to students' language proficiency levels.
7. Although there was evidence of thoughtful planning and lesson design for the delivery of instruction for ELLs, this varied among school sites and among classrooms in each school site.
8. A specific set of deliverables is in place using digiCOACH to monitor practices during both designated and integrated ELD to ensure that students are learning about the language and using the language for meaningful purposes to support both language acquisition and content learning.
9. The implementation of designated and integrated ELD as a single, cohesive system of support for ELLs varied greatly from site to site as evidenced through classroom observations.

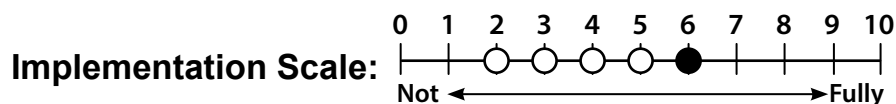


## Recommendations for Recovery

1. District personnel and site leadership should focus on a specific set of deliverables to monitor the emerging practices of designated ELD at each school site, paying special attention to excellence in providing students with the language development that allows for full participation and access to the core curriculum.
2. The district has strongly emphasized consistently delivering designated ELD, its focus should now be placed on monitoring and support for instructional practices that ensure quality instruction during this designated time.
3. The data collected during ELD program monitoring and observations should now be used to inform professional learning and direct support to classroom instruction to provide for continuous improvement.
4. The district should continue to monitor and provide direct support to school sites to ensure consistent districtwide MTSS, thus ensuring equitable access to instructional programs and support for all students.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 3.6 Instructional Strategies

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### Legal Standard

The LEA provides students with the necessary courses to meet the high school graduation requirements. (EC 51225.3) The LEA provides access and support for all students to complete UC and CSU required courses (A-G requirement).

### Findings

1. The district continues to provide the courses, access, and support needed to meet the high school graduation requirements and for students at most schools to complete the courses required by the University of California (UC) and California State University (CSU). The Educational Services Department continues to evaluate master schedules each spring to ensure availability of courses and make certain they contain the rigorous courses required to prepare students for higher education. Interviews indicate the district continues to make a concerted effort to ensure that all core classes and electives meet A-G requirements. The district continues to focus its efforts on course offerings for ELLs to ensure that they are enrolled in both an English class, as well as ELD so that they can meet A-G requirements. Counselors continue to be the main communicators of A-G requirements for students.
2. All students continue to have access to core subjects via the Apex online courses (UC approved), and teacher facilitators are available to assist with credit recovery or grade improvement.
3. In 2020-21, the last year graduation rate data was available through Ed-Data, the district experienced a slight decrease to 86.2% in the cohort graduation rate, down from 87.2% in 2019-20 and 88.5% in 2018-19. Disproportionality exists in the district's graduation rates by race/ethnicity and gender, and certain groups are less likely to graduate including SWDs and ELLs who had a 70.1% and 78.5% graduation rate, respectively, in 2020-21.

According to Ed-Data, the percentage of cohort graduates meeting UC/CSU course requirements increased from 52.4% in 2019-20 to 62.2% in 2020-21. This is an increase of 26.2% since 2016-17 when rates were 36%. Like with graduation rates, disproportionality exists in the district's percentage of cohort graduates meeting UC/CSU course requirements by race/ethnicity and gender, and certain groups are less likely to meet UC/CSU course requirements including SWDs and ELLs who had 33.3% and 45.3% of students meeting UC/CSU course requirements, respectively, in 2020-21.

4. The college and career readiness performance indicator, as reported on the California School Dashboard, measures how well a district or school is preparing students for success after high school. In 2018-19, the last year college and career readiness was reported on the California School Dashboard, the district was given an overall yellow performance status of 18.9% of students being prepared. That same data shows a large discrepancy between school-level rates. The individual sites ranged from a high of 46.5% to a low of 9.5%.



5. In 2018-19, the last year AP data was available through Ed-Data, fewer students took AP exams over the prior review period. The individual sites ranged from 18.3% to 13.9%. The data showed a higher percentage of district students receiving a score of 3, 4 or 5 from 21.8% in the prior review period to 28.3% in 2018-19. Students who received a score of 3, 4 or 5 ranged from a school high of 26.3% to a low of 13.5%.
6. FCMAT classroom observations continue to show a significant difference in and between the various high schools in effectiveness of instruction and student engagement level.
7. Although the continuation high school effectively addresses the needs of students who qualify for alternative education, there continues to be few formalized opportunities for students to receive early intervention and academic support at the two comprehensive high schools. Most interventions are offered through the Apex program or by individual teachers who identify struggling students.
8. The district continues to offer independent study options and summer school for core courses.

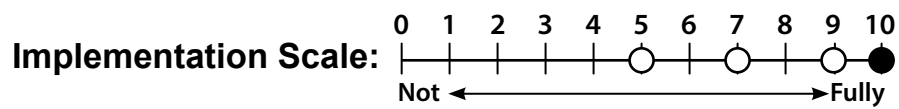
## **Recommendations for Recovery**

1. The district should continue to ensure that every comprehensive high school offers classes on campus that will fulfill the A-G requirements qualifying them for admission to a UC or CSU.
2. The district office and principals of secondary schools should continue efforts to upgrade the rigor and instruction in UC- and CSU-required courses (A-G requirement) to adequately prepare students for higher education.
3. The district should conduct an analysis to determine why disproportionality exists by race/ethnicity and gender in the district's graduation rate and the percentage of students meeting UC and CSU course requirements, and develop a plan to address the root causes.
4. The district should continue to use counselors to message A-G requirements to students.
5. The district should assess AP exam data and determine whether fewer students take AP exams than the prior review period. If fewer students are taking AP exams, the district should conduct an analysis to determine why and develop a plan to address the root causes.
6. The comprehensive high schools should develop systems for early identification and formalized support of struggling students who do not meet the required academic measures.



## Standard Fully Implemented

July 2013 Rating:	5
July 2014 Rating:	7
July 2015 Rating:	9
July 2016 Rating:	9
July 2017 Rating:	10
July 2018 Rating:	10
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 3.7 Instructional Strategies

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### Legal Standard

The LEA provides an alternative means for students to complete the prescribed course of study required for high school graduation. (EC 51225.3)

### Findings

1. Alternative education at the continuation high school continues to remain stable and provide practical options for students and families who struggle to succeed in the comprehensive high schools. The district reported that the continuation school will move from the current campus to Inglewood High School for the 2022-23 school year.
2. Staff continues to report a priority of effective communication between the continuation high school and the other high schools when a student transfers between schools, allowing for a smoother transition. Staff reports that counselors are instrumental in that communication.
3. Although seniors receive priority, the district's continuation high school continues to serve students from other grades.
4. Students continue to be able to recover credits or improve D grades by completing the UC approved coursework through the Apex online program. The district continues to provide an alternative means for students to complete the prescribed course of study required for high school graduation at each of its high schools, which includes the following:
  - Referral to Inglewood Continuation High School (ICHS) for inclusion in the general educational development high school diploma program.
  - An outreach independent study program through the district's continuation high school.
  - Participation in the Southern California Regional Occupational Center (SCROC).
  - Participation in the El Camino College concurrent enrollment program.
  - Participation in summer school to obtain necessary credits.
5. The district did not have opportunities for high school students to make up missed time/attendance with Saturday school sessions.
6. Inglewood High School (IHS) had a virtual accreditation team visit from the Western Association of Schools and Colleges (WASC) in 2020-21 to assess probationary status progress. Following that visit, IHS exited probationary status and received accreditation until 2024, with a midcycle one-day visit planned for spring 2022. IHS was preparing for its midcycle one-day WASC visit at the time of FCMAT's review.

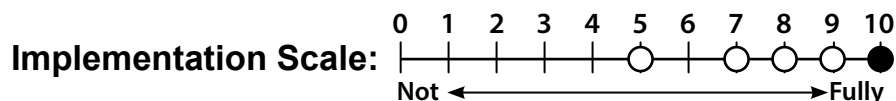


## Recommendations for Recovery

1. The continuation program at ICHS should continue to be made available to students who struggle at other high schools.
2. The district should continue to use counselors and prioritize communication between the continuation program and other high schools when students transfer between programs.
3. The district should continue to encourage students to participate in SCROC, summer school, the independent study program and the El Camino College concurrent enrollment program, if eligible.
4. The district should offer Saturday school sessions for high school students to make up missed time/attendance.

## Standard Fully Implemented

July 2013 Rating:	5
July 2014 Rating:	7
July 2015 Rating:	8
July 2016 Rating:	9
July 2017 Rating:	10
July 2018 Rating:	10
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 3.10 Instructional Strategies

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### Legal Standard

The LEA has adopted systematic procedures for identification, screening, referral, assessment, planning, implementation, review, and triennial assessment of students with special needs. (EC 56301)

### Findings

1. The district CAO directly oversees special education. In fall 2020, the district hired a new executive director of special education who has remained in that position. The executive director oversees the administrator of compliance who began in September 2018 and is responsible for returning SWDs in nonpublic schools to the district. For the 2021-22 school year, the program specialist job description was rewritten to extend that position's day to create more time to work on IEP compliance. The program specialist positions were also reorganized to focus support by program as opposed to by school. Additionally, the district developed a job description and hired a special education administrator of instruction in 2021-22. This position is focused on supporting SWDs in their LRE, MTSS, principal and teacher accountability, and student achievement.
2. The Special Education Department offered a two-day paid summer institute. Instructional staff received training on case management responsibilities, including preparation of the IEP-at-a-glance and passport documents for general education colleagues, and school psychologists received training on the Woodcock-Johnson IV.
3. The Southwest SELPA developed a PPM, which was adopted by the district on November 3, 2021. Citing difficulty scheduling all-staff meetings due to the COVID-19 pandemic, the Special Education Department trained staff on the updated PPM through monthly department newsletters.
4. Compliance has been a continued focus for the special education leadership team. The district reported using an IEP checklist to internally monitor IEPs to ensure compliance. The district explained that program specialists are responsible for identifying IEP checklist trends, and then presenting and discussing those with special education teachers and related service providers. Program specialist meeting agendas provided to FCMAT included a discussion on IEP compliance and a list of the number of overdue, unsigned and unaffirmed IEPs. Special Education Department evidence provided to FCMAT demonstrated the department is collaborating with sites on IEP calendars to ensure IEPs are scheduled prior to due dates. In addition, special education staff received training on various IEP checklists on January 13, 2022 (i.e., IEP Compliance Checklist, English Learner Checklist, Transition Checklist), which are resources for case managers.



5. In 2021-22 the district's Special Education Information System (SEIS) operator's position was redesignated as a certificated position. This position is responsible for supporting IEP compliance, and an initial project for this position was to reconcile SEIS and Aeries to ensure that all SWDs were appropriately identified and coded. Each school site is required to use the online SST system, Beyond SST, for managing referrals and progress of struggling students; however, not all principals reported using the system. The district conducted a survey of the online SST system to determine how it is used and what support sites need. i-Ready continues to be used as a universal screening and progress monitoring tool across grades TK-8. For grades 7-12, Achieve 3000 has been required to be administered three times a year, although how sites use the results varies. The online SST system requires recording of interventions used with a student, but because of inconsistencies in the type of interventions offered at various school sites, significant numbers of underachieving students are still referred to special education with little to no documented interventions. A special education referral tracking form was developed and is used to track the students who are in the SST process prior to referral for a special education assessment.
6. School psychologists meet monthly, and meeting agendas indicated initial and triennial assessment request data is analyzed at those meetings. Additionally, beginning in November 2021, the Special Education Department began maintaining a spreadsheet populated monthly by the school psychologists, which is used to facilitate a conversation addressing patterns in referrals for assessment, requests by school site, SST/MTSS data, indicators of possible overidentification, etc. The team then determines if targeted support is needed for a staff member, site, group of sites, etc.
7. The Special Education Department is tracking and has reviewed initial assessment data by site. A comparison report, listing initial assessments conducted between August and January, showed the district conducted 75 initial assessments in 2019-20, 38 in 2020-21, and 82 in 2021-22.

## **Recommendations for Recovery**

1. The district should continue to focus on complying with IEP timelines through IEP progress reports to monitor upcoming annual IEPs by month, and the number of overdue IEPs (e.g., annual/30 days, triennial assessments, initial assessments, unsigned IEPs, and unsigned amendments). The Special Education Department's administrator of compliance should continue to communicate and provide data reports indicating the number of overdue IEPs for site principals and special education staff. The district should hold site administrators and staff accountable for following all assessment timelines for initial and triennial IEPs, and any noncompliance should be reflected in evaluations.
2. The Special Education Department should continue to provide annual training for all site administration and special education staff to implement the content of the updated special education procedural manual. Because of the district's high attrition rate, training should be ongoing and systematic with all district personnel involved with special needs students on the policies and procedures contained in the manual. Site-level leaders should advocate for any needed training for their special education staff. Once staff are trained, these leaders should hold site staff responsible for the full implementation of



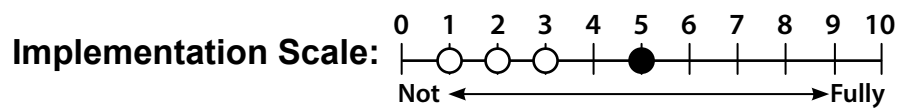
these policies and procedures, and any noncompliance should be designated as an area for improvement in evaluations.

3. The district should continue to focus on scheduling assessments and IEPs and accountability for monitoring the compliance of assessments, IEPs and transition plans. It should evaluate the causes leading to noncompliance and focus training on the reasons most identified. The district should continue to use program specialists to assist in training site staff, as well as continue their assistance in the scheduling and monitoring of IEPs. It should also continue to hold site administration accountable for monitoring and facilitating this process at their school sites. Additional support should be provided to school sites that have noncompliance numbers that are persistently high, with a specific analysis of the reason for the high numbers. When noncompliance issues originate with particular personnel and are within their control, their evaluation should focus on improvement in this area.
4. Because all sites are expected to use the online SST platform, the district should ensure additional training is offered where needed and all sites should be held accountable for its use. Sites should continue to use i-Ready as a tool for universal screening and progress monitoring in grades TK-8. If used effectively, the i-Ready data could be used to support initial placement in a special education program. The district should continue to use Achieve 3000 for grades 7-12, focusing training on how to use the results consistently across the district as intervention for struggling students.
5. The district should provide training/professional learning to all teachers, focusing on strategies to support struggling students and the interventions that should be offered in the general education classroom prior to any referral for an SST that could lead to possible special education placement.
6. The district should continue having the executive director of special education attend principals' meetings to increase the level of communication between school sites and special education leadership. This will continue to help district administration to identify areas of concern and allow them to facilitate resolution when needed.
7. The special education administration should continue to track referrals monthly and compare them to students who qualified as eligible for special education to determine if referrals are valid, look for trends in students qualifying as well as sites that may be over-referring students for special education instead of offering appropriate interventions.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	5





## 3.12 Instructional Strategies

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### Legal Standard

Programs for special education students meet the least restrictive environment provision of the law and the quality criteria and goals set forth by the California Department of Education and the Individuals with Disabilities Education Act. (EC 56000, EC 56040.1, 20 USC Sec. 1400 et. seq.)

### Findings

1. Interviews and information reviewed indicate some progress in this area, which requires that programs for special education students meet the LRE provision of the law and the quality criteria and goals established by the CDE and the IDEA. In its most recent data released, the CDE's 2019-20 Special Education Annual Performance Report Measures shows that the district continues not to meet all three targets of LRE measures for students ages six to 22. The district met both targets for preschool LRE in 2019-20.
2. The district was required by CDE to address Element 5a: LRE-Regular Class 80% or more, Element 5b: LRE-Regular Class less than 40%, and Element 5c: LRE-Separate School in their 2019-20 Special Education Plan. The 2019-20 Special Education Plan identified the root causes of noncompliance with each indicator.
3. The district established a priority to increase the percentage of SWDs served in the LRE. Accordingly, on January 10, 2022, special education staff received initial training on Chapter 5 of the Southwest SELPA PPM, which addresses LRE. On January 21, 2022, site administrators received similar training. At the time of FCMAT's visit, the district was finalizing an LRE instructional memo to clearly outline LRE expectations for site teams.
4. To work towards reducing the number of SWDs in separate schools the Special Education Department assigned one program specialist to nonpublic schools in 2021-22 to facilitate consistent communication and practices with their nonpublic school partners. Additionally, the district opened a new classroom focused on therapeutic behavior support for SWDs at Morningside High in January 2022. The intent is to use this placement option to keep SWDs in a program on a comprehensive district campus instead of a separate school setting.
5. District leadership continues to identify LRE as an area needing constant communication of expectations and building capacity of site leadership and instructional staff to make appropriate placement decisions during IEP meetings.

### Recommendations for Recovery

1. The district should continue to train all education specialists and related service providers on how to properly add IEP services and document the percentage of time out of the general education setting. Annual training should be provided for all staff serving as



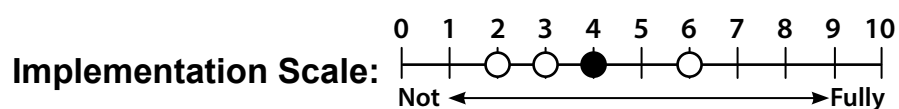
administrative designee at IEP meetings, so they can verify that the percentage of time out of the general education setting is accurate before they sign the IEP. A sampling of district IEPs should be regularly audited to ensure the percentage of time out of the general education setting is reported accurately. If specific service providers are identified as struggling in accurately reflecting this information during the audit, the district should provide specialized 1-on-1 training, monitoring, and support.

2. The district should examine placement options and the potential harmful effects of placement for each disability by site, group, and grade level. In developing the training schedule for the upcoming school year, the district should provide training to instructional staff, related service providers, and administrative designees specific to understanding the continuum of services and policies and procedures related to placement of students in the LRE. The district should hold site administrators and staff accountable for following all policies and procedures, and any noncompliance should be reflected in evaluations.
3. The district should continue to provide targeted support to teachers and administrators so that special education students benefit from the LRE. The district should build on the LRE trainings conducted in January 2022 so all teachers, special education paraprofessionals and administrators receive regular training in effective teaching strategies and inclusive practices. Site leaders should monitor the level of support special education teachers provide to general education teachers when students are mainstreamed and facilitate designated meetings between these teachers to regularly discuss strategies to help students be successful in the mainstream environment.
4. The district's special education leadership should continue to be aggressive in its efforts to ensure all schools and programs for special education students meet the LRE provision of the law and the quality criteria and goals established by the CDE and the IDEA.
5. The district should take steps to ensure that each classroom adheres to special education policies and requirements, including the following:
  - Unannounced audits of classrooms and IEPs should be completed and documented.
  - A plan should be developed to increase the principals' skills and knowledge so they can assist and evaluate assigned special education teachers.
  - School sites must be consistently monitored and supported.



## Standard Partially Implemented

July 2013 Rating:	6
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 3.13 Instructional Strategies

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### Professional Standard

Students are engaged in learning, and they are able to demonstrate and apply their knowledge and skills.

### Findings

1. The district's LCAP, Strategic Plan, as well as the schools' SPSAs, delineate the issue of low student achievement throughout the district. Specifically, the district has high percentages of students not meeting grade-level standards and high school students failing one or more classes. The district has also noted that higher percentages of ELLs and SWDs are in these categories than are other student groups. The district's leadership has identified, and FCMAT agrees that there are several contributing factors, but the primary factor is the lack of consistent, effective first instruction with rigor being the greatest barrier to student success. Although the district developed coherent, systematic plans such as the MTSS 2021-24 and the Instructional Priorities Plan 2021-22, they are in early stages of implementation and have not yet translated into improved student achievement. The district adopted the digiCOACH classroom walk-through as the tool for all principals to use to monitor instruction. The components of the Instructional Priorities Plan 2021-22 are included in that program.
2. During FCMAT classroom observations, most teachers were observed delivering instruction to students during designated time slots that matched the posted instructional schedule. A few teachers were observed using graphic organizers, conducting close reading activities, checking for understanding and facilitating small-group discussion/group work. However, students were also observed being compliantly engaged in the instructional process for most classrooms visited. Additionally, FCMAT minimally observed differentiation of instruction or response to intervention (RtI). In short, a wide variability of instructional practices was observed throughout the district.
3. Lesson plans reviewed during classroom visits were found to be inconsistent in content and specificity throughout the district. Some were detailed, but many contained general outlines of the day's lessons. FCMAT also noted an inconsistency regarding how principals reviewed and monitored teacher lesson plans.
4. In collaboration with LACOE through the AB 1840 process and with CCEE support, the district is beginning to develop and monitor more systematic plans for instructional improvement as detailed in the Theory of Action Plan and the SIR progress monitoring tool.



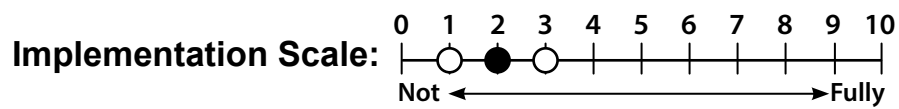
## Recommendations for Recovery

1. The district should continue to focus on student achievement and to use the MTSS Plan and Instructional Priorities 2021-22 Plan to establish a systems-approach to goals with key strategies to achieve those goals. The district has identified its annual achievement goals and targets, and the previously mentioned plans provide the structures to move the district forward. District leadership should set the tone of high expectations and model the practices, such as CoI, that align to them accordingly. Monitor sites to ensure written procedures translate into practice districtwide and continue to collaborate with the CCEE and LACOE through the SIR progress monitoring quarterly updates. Analyze the effectiveness of the Instructional Priorities Plan 2021-22 and, collaborating with educational partners, adjust and revise, as data indicates to continue instructional improvements in 2022-23.
2. The district should continue to systematically and incrementally implement the components of effective first instruction, which it has identified in its Instructional Plan as focus, engagement, and differentiation. The district should hold principals accountable for using digiCOACH as directed by the district. The district should continue to conduct CoI activities with principals using quantitative and qualitative data after walk-through data has been collected and continue to calibrate implementation ratings to ensure practices and expectations are consistent districtwide. Provide a continuum of support to principals and teachers, as indicated by the digiCOACH data.
3. The district should develop written expectations for lesson plans. Principals should review teacher lesson plans weekly to ensure that they are intentionally designed according to the district's Instructional Priorities, that they include the district's identified strategies for effective first instruction, and they reflect the rigor of the standards taught that week.
4. The district should continue to ensure that teachers use i-Ready appropriately for Tier 2 intervention and not in place of classroom instruction or Tier 1 interventions, such as reteaching, based on teacher formative assessment, which should occur during the instructional process.
5. The district should continue to use the CoI process to inform district and site staff of student achievement levels. This should be accomplished with the understanding that although some factors are outside of the district's control, research shows that schools can improve most factors with high expectations for all students and high-quality instruction with a well-developed and consistently implemented MTSS.
6. The district should continue to provide a continuum of ongoing professional learning opportunities for teachers that are aligned with the district's instructional expectations and the CCSS. The continuum should include workshops/trainings, on-site collaboration, and collaborative classroom walk-throughs to include strategies in the instructional plan, as well as on-site coaching and individual support for teachers based on identified need. Continue to effectively use the district's instructional coaches to support teachers and principals.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 3.15 Instructional Strategies

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### Professional Standard

The LEA optimizes opportunities for all students, including underperforming students, students with disabilities, and English language learners, to access appropriate instruction and standards-based curriculum. (DAIT).

### Findings

1. Curriculum design and implementation of designated ELD instruction for ELLs were reportedly used, including use of approved curriculum for designated ELD. The quality of the delivered instruction continues to vary across the district and in some school sites.
2. Information is readily available to teachers on the students in their classrooms who are identified as having learning disabilities or who are ELLs; however, instructional strategies for these students have varying implementation.
3. The district uses RtI for struggling students, but implementation continues to vary by school site.
4. The district uses PBIS programs to support positive school climate and student behaviors. Structures for delivery and professional learning in this area continue throughout the district, although implementation of this process is varied across the district.
5. High schools offer ELD in a two-block format, allowing ELLs to receive both designated ELD, as well as grade-level content in English.

### Recommendations for Recovery

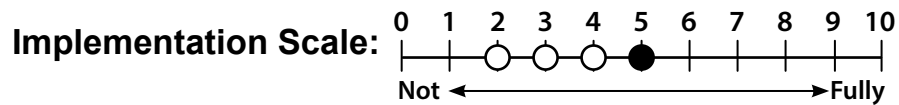
1. District administrators and site principals should continue to work collaboratively to refine processes and consistently implement MTSS.
2. Principals should continue to observe classrooms to ensure that sound instructional strategies are used to provide ELLs access to the core curriculum, including continuing the practice of daily designated ELD. Special attention should be paid to increasing rigor as ELLs move through grade levels.
3. Principals' classroom observations should continue to focus on collecting data on district-established expectations to ensure appropriate targeting of professional learning planning to support instruction, including instruction for students with disabilities or who are ELLs.
4. The district should continue to examine and refine the RtI process at each school site, providing additional support for the sites that are not fully implementing the process.



5. The district should continue to examine and refine PBIS programs at each school site, providing additional support for the sites that are not fully implementing the process.

### Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	5





## 3.16 Instructional Strategies

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### Professional Standard

The LEA makes ongoing use of a variety of assessment systems to appropriately place students at grade level, and in intervention and other special support programs. (DAIT)

### Findings

1. The district Instructional Plan, Strategic Plan and LCAP include goals and action steps related to the use of assessments to appropriately place students at grade level, and in intervention and other special support programs.
2. i-Ready is the primary required assessment used across the district for grades TK-5 to diagnose student learning needs in ELA and mathematics and to place students appropriately in available support programs. Elementary teachers are required to administer the diagnostic i-Ready assessment three times per academic year. DIBELS, also administered three times per year, may be used for placement purposes with K-2 students. Achieve 3000, also required three times per year, is the primary assessment used by secondary teachers to diagnose and monitor student learning in ELA. i-Ready is used by secondary teachers to diagnose and monitor student learning in mathematics.
3. In addition to the district required i-Ready and Achieve 3000 assessments, teachers at all grade levels are expected to use site/grade level selected formative assessments for both ELA and mathematics three times a year. Grade levels may select from the assessments provided by the core instructional materials programs or from the Smarter Balanced interim assessments to meet this requirement.
4. Individual teachers are expected to use results from the i-Ready, DIBELS and Achieve 3000 assessments to identify students for in class Tier 1 and Tier 2 support, tutoring support through the Hey Tutor program and after-school teacher tutoring. Progress monitoring of student performance is also based primarily on i-Ready, DIBELS and Achieve 3000 results.
5. Principals indicated on principal surveys and/or during interviews that in some cases teachers are also using core instructional materials assessments for identification for intervention and monitoring of student progress.
6. The process for effective, evidence-based use of assessment information to make decisions on student placement varies between school sites.
7. The district is engaged in the development of a comprehensive MTSS that includes systematic tiered intervention and other special support programs to meet student needs. An MTSS manual has been drafted that provides detailed information on a three-tiered system of support for learners. The manual states that in addition to i-Ready and Achieve 3000 assessments, Agile Minds and Imagine Learning assessments may be used as a part of the identification process for students needing Tier 2 and Tier 3 academic interventions.



8. There is no districtwide Tier 3 intensive intervention system/program to meet the needs of students performing significantly below grade level expectations in ELA or mathematics. District staff indicated that the focus for the 2022-23 school year will be on expanding Tier 2 support options and developing Tier 3 structures and services.

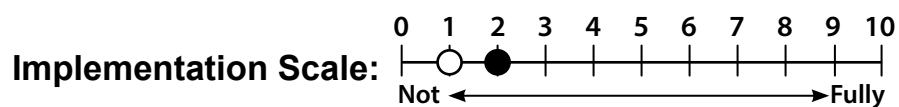
## **Recommendations for Recovery**

1. Accelerate efforts to fully implement all goals and action steps in district-level and site plans related to the ongoing use of a variety of assessment systems to appropriately place students at grade level, and in intervention and other special support programs.
2. Provide ongoing professional learning, including guided practice activities, to administrative and instructional staff on the use of assessment results as a data point for instructional grouping, targeted reteaching, and classroom intervention or acceleration programs. Include content in the professional learning experiences that is designed to deepen teacher awareness and their use of the variety of identification and placement resources available in the curricular programs and required assessments (including CAASPP Tools for Teachers website and other resources available on the CAASPP website).
3. Ensure that multiple assessment measures are used to identify specific student learning needs when making placement decisions in the classroom and for any support programs outside of the general education classroom.
4. Select and fully implement diagnostic and progress monitoring assessments designed to provide detailed information on student learning strengths and needs for use with students that do not demonstrate progress with classroom level and/or after-school interventions (some Tier 2 and all Tier 3).
5. Finalize the MTSS system structures, processes, and procedures and begin implementation of a comprehensive tiered MTSS across the district. Ensure that students are assessed using a variety of assessment tools and are placed in appropriate academic and/or behavioral support programs based on diagnostic evidence.
6. As a component of the MTSS framework, develop a districtwide Tier 3 intensive intervention system for ELA and mathematics for students performing significantly below grade level standards. Include the use of additional assessments that provide detailed diagnostic information on the learning needs of identified students and short cycle formative assessments to continuously monitor student learning progress/impact of services.
7. Continue to partner with the CCEE and LACOE (e.g., support services, assessment network, and other relevant county office staff) to strengthen and deepen implementation of a comprehensive districtwide MTSS system, including the use of a variety of assessments to identify student needs, determine placement in support programs, and to monitor learning progress over time.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 3.17 Instructional Strategies

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### Professional Standard

Programs for English language learners comply with state and federal regulations and meet the quality criteria set forth by the California Department of Education.

### Findings

1. The district has developed a clear plan for ELLs, which explains how programs for ELLs comply with state and federal regulations and meet the quality criteria set forth by the CDE.
2. Both integrated and designated ELD instruction was observed in many classrooms throughout the district in accordance with the district ELD plan.
3. The district continues to use a reclassified student monitoring record to provide for review and monitoring of individual student's needs after they have exited the ELL program.
4. Data regarding ELD instruction is available using a classroom instruction observation system.
5. In some classrooms and at some school sites, data is systematically and consistently analyzed to focus on the progress of ELLs, allowing teachers to adjust instructional strategies.
6. The high school level has a consistent time block and plan for the delivery of daily designated ELD, as well as a second block of English as a subject area.

### Recommendations for Recovery

1. The district should continue to use the available classroom instruction observation system to provide data for site principals and classroom teachers to adjust instructional strategies.
2. The district should continue implementing its system for monitoring ELLs and reclassified students to ensure they continue to make academic progress.
3. The district should ensure that district and site-level data is consistently analyzed to measure the effectiveness of instruction for ELLs.
4. District office personnel should continue implementing a systematic approach to helping site principals and teachers in serving ELLs and holding them accountable for complying with state and federal regulations on instructional support for ELLs.



## Standard Partially Implemented

July 2013 Rating: 2

July 2014 Rating: 2

July 2015 Rating: 2

July 2016 Rating: 2

July 2017 Rating: 2

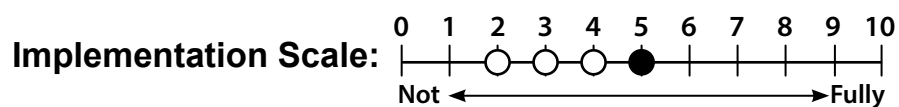
July 2018 Rating: 3

July 2019 Rating: 4

July 2020 Rating: Omitted per SB 98, Section 102 due to COVID-19 pandemic

July 2021 Rating: 3

July 2022 Rating: 5





## 3.18 Instructional Strategies

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### Professional Standard

The LEA employs specialists for improving student learning, including content experts and specialists with skills to assist students with specific instructional needs.

### Findings

1. The district employs instructional coaches that have both elementary and secondary levels of experience. Coaches are located at school sites, easily providing direct service to classroom teachers.
2. In interviews with teachers and school site leadership, district instructional coaches are viewed as an invaluable aspect of the school site instructional team.
3. Due to the pandemic, instructional coaches were called on to substitute in classrooms for much of the 2021-22 school year, which limited their opportunities to serve as instructional support for teachers.
4. When they were able to serve in their capacity as coaches, instructional coaches worked effectively with classroom teachers, site administrators, and district personnel to provide both the professional learning and immediate support necessary for quality service and instruction.

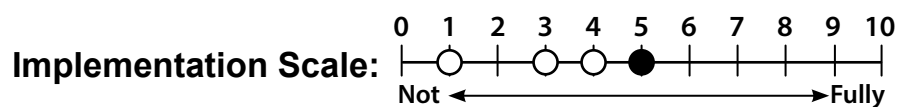
### Recommendations for Recovery

1. Given the district's high number of ELLs and the emphasis on providing instruction using the California ELD standards, the district should provide professional learning for the instructional coaches addressing ELD and delivery of services to ELLs districtwide.
2. The district should work with school site personnel to develop a consistent, targeted plan for equitably utilizing instructional coaches to further affect instruction and increase the effectiveness of classroom teachers.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 3.22 Instructional Strategies

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### Professional Standard

The LEA offers a multiyear, comprehensive high school program of integrated academic and technical study that is organized around a broad theme, interest area, or industry sector. (EC 52372.5, EC 51226)

### Findings

1. Both comprehensive high schools offer dual enrollment opportunities for students through El Camino College.
2. The district has increased the number of dual enrollment opportunities and increased the articulation between the district and El Camino College ensuring programs are more aligned with workforce development and A-G requirements.
3. The district has a clear understanding of A-G requirements.
4. The district has a clear process for supporting students and parents in their understanding of the necessity of meeting A-G requirements.
5. The district has a clear process for ensuring that data for A-G requirements is clear and accurate.
6. The district has committed the necessary resources to ensure that all students can meet A-G requirements.
7. The district has various CTE options for its students offered across high school sites.

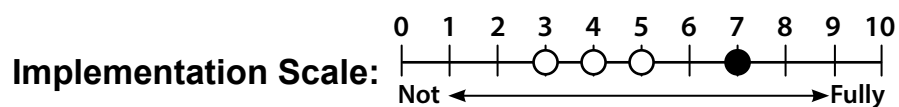
### Recommendations for Recovery

1. The district should continue communication and partnership with El Camino College to continue dual enrollment opportunities and innovative practices in providing coursework to students.
2. The district should continue to offer programs and pathways based on community-identified interests and needs.
3. The district should continue to implement a system of support to ensure that the degree of execution and delivery of programs and courses is consistent from school to school.
4. The district should continue to ensure that all students can meet all A-G requirements in the district and during the school day.



## Standard Partially Implemented

July 2013 Rating:	5
July 2014 Rating:	5
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	7





## 4.3 Assessment and Accountability

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### Professional Standard

The LEA has developed summative and frequent common formative assessments that inform and direct instructional practices as part of an ongoing process of continuous improvement.

### Findings

1. The district Instructional Plan, Strategic Plan and LCAP include goals and action steps related to the implementation of an assessment system that provides district and classroom level assessment data to measure student mastery of the content standards and inform decision-making at all levels of the district.
2. The district disseminated an assessment schedule for 2021-22 that lists all district required assessments and the timeline for their administration (see Standard 2.4). Clear assessment expectations and structures are in place and written and video communication from the CAO was distributed to administrative and instructional staff detailing the purpose and components of the system. According to surveys and principal and teacher interviews, there was variability between school sites in how and at what depth the assessment information from the CAO was shared with teachers.
3. The communication from the CAO explicitly stated the purpose of assessments in the district, noting that "...This assessment system is used collaboratively to improve instruction..."
4. There is minimal evidence that data from the required assessments is used systematically across the district to improve classroom instructional practices.
5. District expectations for the use of a CoI to review and analyze data from district required assessments have been articulated during training and in memos from the CAO. In district communications, CoI is described as "...deliberate, systematic analysis of individual student data."
6. The district disseminated a CoI process and data analysis template for all school sites. The template has a component for individual teacher reflection/analysis/planning and a component for grade level/content area team reflection/analysis/planning. Professional learning on the CoI process was provided to administrators and teachers at the beginning of the 2021-22 school year. A model of a completed form was provided as part of the handout materials for the training.
7. Documentation provided to FCMAT validated that grade level/content area data review meetings generally occur as required by the district. The consistency and quality of these meetings is variable between school sites and across grade levels/departments. Submitted samples of completed CoI forms from individual teachers and some grade level/content area teams continue to demonstrate wide variability in the quality implementation of the process and of actionable work products resulting from the analysis process. On some



samples, individual students were identified by name as needing additional support. Strategies listed to address student needs were mostly general, such as reteaching without an indication of specific standards or subskills of standards that would be retaught. Content was generally noted as phonics or reading comprehension, again lacking specificity regarding targeted standards or subskills. No individual or team examples were provided to FCMAT that included specific, measurable goals with instructional action steps to address identified student needs.

## **Recommendations for Recovery**

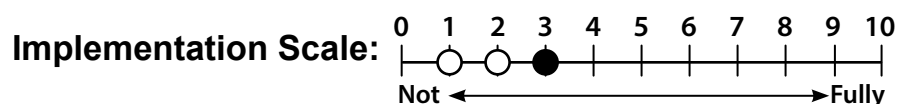
1. As addressed in the Instructional Plan, Strategic Plan and LCAP, the district should focus on effective, continuous use of student performance data to guide instructional decisions at the district, site, and classroom levels as an urgent priority. Ensure that district Educational Services staff continue to publicly and explicitly model this process in making evidence-based district-level instructional decisions. Formulate measurable action steps to address district level problems of practice. Identify progress monitoring/evaluation procedures to monitor effectiveness of the proposed actions (see Standard 2.4).
2. Continue to frequently and explicitly discuss the purpose of required assessments and the role they play as a component of a coherent instructional system. Whenever possible, verbally and in writing, communicate the connection of assessments/assessment data to the district identified instructional priorities and relevant performance indicators.
3. Establish clear, explicit expectations for how district disseminated communication documents and videos are to be shared and discussed with teachers by site administrators. Review site meeting agendas and sign-in sheets to ensure that all teachers receive and have an opportunity to discuss the content of the communications.
4. Continue to communicate the importance of the CoI process as a continuous improvement tool/strategy. Teachers should be supported in applying the steps of the process to selected data, formulate a measurable goal, implement action(s), progress monitor and evaluate the results of the actions during subsequent CoI sessions. Action plans should be adjusted as appropriate to the results.
5. Increase the emphasis on frequent use of the full range of detailed data and resources/tools for informing and directing instruction that are available in the district required assessments programs (e.g., standards data, student by student item level analysis, depth of knowledge levels of items, planning templates, grouping strategies). Emphasize the use of these tools as an integral part of the CoI reflection, analysis, planning, and monitoring process by individual teachers and grade level/content area teams (see Standard 2.4).
6. Consider training a cadre of CoI teacher facilitation leaders. Those leaders could facilitate grade level/content area CoI sessions and provide additional professional learning experiences to help support the full, effective implementation of the process.



7. Building on training already provided and possibly utilizing the teacher facilitation leaders suggested above, continue to provide district and site administrators and teachers with ongoing professional learning to increase their knowledge and skill to engage in deep analysis of student performance data to inform and direct instructional and curricular decisions at the district, school, and classroom levels (see Standard 2.4). Include a continuum of professional learning opportunities and formats beyond workshop presentations (e.g., demonstrations, modeling, observations, reading, dialogue, case studies, lesson study). The learning experiences should offer hands-on practice in applying specific strategies/techniques for administrators and teachers to deepen their analysis of student achievement data resulting in explicit, measurable goals and instructional action plans. Include follow-up procedures/strategies for monitoring implementation of the instructional action plans, and for evaluating the impact of the actions on classroom instructional practices and student learning.
8. The executive directors of elementary and secondary education should provide frequent on-site support to principals and monitor progress on the development of evidence-based, measurable goals and instructional action plans generated by grade level/content area CoI teams. The executive directors should ensure that teacher teams and principals are accountable for implementation and progress monitoring of the action plans.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 4.4 Assessment and Accountability

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### Professional Standard

The LEA provides an accurate and timely school-level assessment and data system as needed by teachers and administrators for instructional decision-making and monitoring.

### Findings

1. The district Instructional Plan, Strategic Plan and LCAP include goals and action steps that require the use of data-driven instructional decision-making and monitoring.
2. The district system provides school and classroom level assessment data to principals and teachers in a timely manner. A wide range of detailed information can be generated through the assessment reports available, including grade level, teacher, individual student, content standard, assessment target, item level, and DOK level results. The Aeries student information system provides additional student-level data.
3. There is minimal evidence that the broad range of assessment data available in program reports is effectively analyzed and systematically used to guide instructional decision-making at the district, site, or classroom level.
4. The district has established expectations for the use of data for instructional decision-making and monitoring of student progress and has developed initial data analysis structures and procedures. Those structures and procedures for effective use of district-provided data are not systematically and consistently implemented across the district (see Standard 4.3). There is evidence that individual teachers and teacher teams meet as required and using the CoI template; however, the sample forms submitted to FCMAT were often incomplete and lacked measurable goals and action steps to address standards-based student learning needs identified through CoI reflection and analysis.
5. Based on analysis of data provided through the district system, in 2020-21 the Educational Services team identified a problem with i-Ready completion rates. A 95% completion rate target was set during the 2020-21 school year. Completion rate averages for district required assessments continue to be below the 95% completion target during this academic year. In some cases, they may decrease the accuracy of the data generated from the assessments. As noted in Standard 2.4, on one beginning of the year assessment, districtwide grade level completion rates ranged from 49% to 91%. The Educational Services team is continuing to collect data on this issue and is monitoring progress toward achieving the 95% completion goal.

### Recommendations for Recovery

1. The district should frequently communicate to all instructional staff the importance of timely completion of district required assessments to provide data for instructional planning and monitoring.

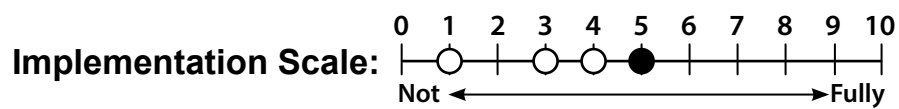


2. The district should continue to monitor completion rates for required assessments at all grade levels and develop strategies to address noncompletion issues. Hold principals and teachers accountable for completion of required assessments as calendared in the assessment schedule.
3. The district should increase district focus on consistently implementing and monitoring processes/procedures to ensure that assessment data provided by the district is used to inform instruction and monitor student learning progress as described in district plans.
4. The district should continue to provide a continuum of professional learning opportunities to district and site administrators, instructional support providers and teachers to increase the capacity of all instructional staff to effectively analyze and apply data to district and site level instructional planning and to classroom instructional practices (see Standards 2.4 and 4.3). To the greatest extent possible, the professional learning experiences should involve teams:
  - Using actual district-provided student performance reports.
  - Engaging in structured, hands-on guided practice in analyzing those reports.
  - Engaging in thorough reflection and analysis.
  - Developing data-based, measurable goals and instructional action plans based on that reflection and analysis.
  - Identifying progress monitoring tools/strategies to track the impact of implementation of the instructional action plans on student learning.
5. The district should regularly allocate time during district and site staff meetings dedicated to understanding the full range and potential uses of the reports and tools/resources available for the district required assessments and using those reports and resources in the development of evidence-based, measurable goals and instructional plans. These meetings should be part of a coherent, ongoing continuum of professional learning that focuses on the effective use of district-provided assessment data to accelerate student learning through improved classroom instruction.
6. The district should hold district and site administrators and teachers accountable for using the district, school and classroom level data provided by the district system to improve classroom instruction through targeted classroom observations, review of lesson plans, staff meeting and CoI meeting products (e.g., plans, schedules, lessons based on data analysis), and student work products.



## Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 4.5 Assessment and Accountability

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### Professional Standard

School staff assesses all students to determine students' needs, and whether students require close monitoring, differentiated instruction, additional targeted assessment, specific research based intervention, or acceleration.

### Findings

1. The district Instructional Plan identifies a key action of implementing an integrated MTSS framework to provide individual student support.
2. A districtwide MTSS as described in the California ELA/ELD Framework is in the development stage. A comprehensive MTSS Guide document has been drafted and is expected to be rolled out districtwide in the 2022-23 school year. Initial professional learning on the tiered MTSS system for academic and behavioral issues has been provided to administrators. Effective first instruction has been identified as the primary Tier 1 universal strategy to address academic needs of all students. Professional learning on the key elements of effective first instruction was provided to staff in past years.
3. The district requires completion of multiple academic assessments throughout the school year, as detailed in the district assessment schedule (see Standard 2.4). Some of these assessments are used as universal screening tools and yield data that can be used to help determine student needs for close monitoring, differentiated instruction, additional targeted assessment, intervention, or acceleration. Several required assessments, as well as the adopted instructional materials, have online tools and resources designed to support close monitoring, differentiated instruction, targeted assessment, and/or research-based intervention, or acceleration.
4. Data from the district required assessments is used inconsistently by school staff to identify student learning needs, and determine whether students require close monitoring, differentiated instruction, additional targeted assessment, specific research-based intervention, or acceleration. Limited evidence was provided to FCMAT demonstrating regular teacher use of the tools and resources available through the assessments and adopted instructional materials to determine and address individual student learning needs.
5. There is no evidence that the district has identified diagnostic assessments, beyond the required district assessments, appropriate for use in determining the needs of Tier 2 students not responding to initial classroom intervention or for students identified at Tier 3 of the MTSS system (e.g., diagnostic reading inventory, diagnostic math assessment).
6. The draft MTSS Guide outlines the structure and components for a system with embedded intervention and enrichment. There is wide variation in how, when, at what level of intensity, by whom, and to whom academic intervention services are provided at individual schools during the regular school day. The Hey Tutor program is implemented



during the school day in the classroom setting, serving a limited number of students in need of intervention. Hey Tutor is also in place during after school hours. In addition, after school homework club and tutoring are offered to some students.

7. No system is yet in place to address the needs of students that are unresponsive to classroom embedded Tier 2 supports or of those students in need of intensive Tier 3 intervention services. The district has indicated that expanding Tier 2 options and developing Tier 3 systems will be addressed beginning in the 2022-23 school year.
8. The Educational Services Department has developed a district GATE program that is in the beginning stage of implementation. An initial group of students have been identified for services. GATE activities will occur outside of school hours, including weekends.
9. It is unclear how accelerated instruction is systematically provided at the individual classroom level and few examples were seen during FCMAT classroom observations. Implementation of differentiated instruction varied widely between school sites.
10. Principals conducting classroom observations have varying degrees of knowledge and skill regarding effective instructional and assessment practices. Some are not fully prepared to coach teachers to implement practices that would meet the diverse needs of students through differentiated instruction, close monitoring, additional targeted assessment, specific research-based intervention, or acceleration.

## **Recommendations for Recovery**

1. The district should continue to develop, support, and monitor the equitable, consistent, effective implementation of a comprehensive MTSS process at all sites in the district. Ensure that students are properly assessed using a variety of appropriate assessment tools to identify student needs and to determine which students require close monitoring, differentiated instruction, additional targeted assessment, specific research-based intervention, or acceleration. Finalize the district MTSS Guide and use the guide to support districtwide implementation of the system.
2. The district should accelerate the development of the organizational and procedural components of the Tier 2 (focusing on options for students not responsive to initial classroom Tier 2 support) and Tier 3 levels of the district MTSS system. Include in-depth diagnostic assessments for identifying student needs, progress monitoring procedures/tools to frequently assess student progress, and ongoing MTSS professional learning for educators in the district for effective implementation of Tier 2 and Tier 3 supports. Provide professional learning to appropriate staff on administering selected diagnostic assessments and using detailed diagnostic data to determine student placement in support programs. Ensure that procedures and tools are identified for ongoing evaluation of program impact/effectiveness on instruction and student learning.

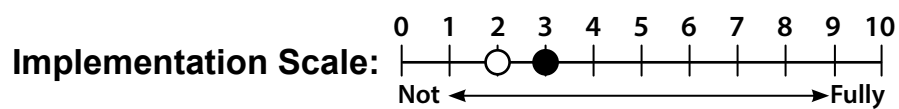


3. The district should continue to develop a formal, systematic, districtwide plan for providing identified students equitable access to intervention and acceleration during regular school hours, as appropriate to identified student need. Continuously refine the embedded intervention and acceleration systems based on student performance data. Include a variety of assessment tools to identify individual student needs as a part of the plan (a range of grade/age level appropriate diagnostic, placement, and progress monitoring assessments). Ensure that the plan is implemented at all sites and that implementation is monitored for equity, consistency, and evidence-based effectiveness. Continue to provide after-school intervention as an additional opportunity to meet student learning needs.
4. The district should provide a continuum of ongoing professional learning experiences to district and site administrators and teachers on the full, effective implementation of the MTSS model for student support, including:
  - High-functioning SSTs and CoIs.
  - In-depth, hands-on learning experiences on effective first instruction (e.g., lesson study, model lessons, in-class coaching).
  - Classroom embedded professional learning experiences to the greatest extent possible.
  - Use of a variety of assessment tools with a focus on identifying those appropriate for Tier 2 and Tier 3 interventions to determine student needs for close monitoring, differentiated instruction, additional targeted assessment, specific research-based intervention, or acceleration.
  - Models for intensive intervention and acceleration service delivery during the regular instructional day.
5. The district should continue to provide district and site administrators with structured, guided practice applying specific techniques for supporting effective teacher use of assessment data to determine individual student needs for differentiated instruction, additional targeted assessment, specific research-based intervention, or acceleration.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 4.10 Assessment and Accountability

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### Professional Standard

The LEA and school site administration monitor fidelity of program implementation in the delivery of content and instructional strategies.

### Findings

1. District expectations for the use of adopted core instructional materials have been established in the Instructional Plan, Strategic Plan and the LCAP and have been communicated verbally and in written form to principals and teachers. A memo and video with detail on the core instructional materials for each grade level/content area was disseminated by the CAO in September 2021. Each principal was responsible for facilitating viewing of the video and discussing the contents of the memo and video with teachers at his or her site.
2. Based on interviews conducted by FCMAT and review of submitted documents, full implementation of the expected viewing and discussion process was inconsistent between school sites. Some teachers indicated that they received the memo through email and never saw the video. Others reported that they received the memo at a staff meeting, viewed the video as a whole staff and discussed the contents of both communications.
3. Instructional priorities have been identified and communicated to all staff through professional learning sessions on the Instructional Plan and the dissemination of an Instructional Priorities poster distributed to all site administrators and teachers. The Instructional Plan provides detail on the performance indicators for each articulated priority and looks at implementation at the scholar, teacher, leadership, and organizational levels.
4. Effective first instruction was identified as a districtwide focus in previous years and that focus continues as a part of the developing MTSS system. In past academic years, the district also selected three core instructional practices that are expected to be implemented daily in classrooms: close reading; academic conversations; and writing across the curriculum to express understanding.
5. Site administrators and the SSCs developed the required SPSA for their respective sites that are aligned to the district Instructional Plan, Strategic Plan and LCAP. The site plans set annual student achievement goals and identified professional practices and educational strategies to reach those goals. Reflecting the district priorities, most plans included at least one, if not all, of the district-selected core instructional practices.
6. There are no measurable action steps described in the district or site plans to monitor the classroom frequency or quality of use of the adopted instructional materials, implementation of the elements of effective first instruction, or the identified core instructional practices.



7. Supplemental materials were observed in use in some classrooms at multiple school sites. During interviews and informal conversations with district and site staff, it became evident that there is a lack of clarity on the district procedures for approval and use of supplemental materials in classrooms.
8. The district expects site principals to collect and review the teacher lesson plan as one way to monitor fidelity to the articulated instructional program content and instructional strategies. Sample lesson plans submitted to FCMAT as evidence of this component of the monitoring process varied considerably in format and content. Some teachers submitted photocopied pages from the instructional materials as the lesson plan while others submitted detailed plans that included standards, objectives, and descriptions of whole and small group instructional activities. In a few examples, small group planning included specific student names.
9. The district expectation is that principals will observe classroom instruction regularly. These observations provide another opportunity for principals to monitor fidelity of program implementation. Principals are expected to identify teachers in need of targeted support and professional learning in the delivery of content and the use of prioritized instructional practices and to provide appropriate support to those teachers to increase their instructional effectiveness.
10. During the 2020-21 school year, the district decided to return to the use of the digiCOACH tool that had been used in the past for observing classroom instruction and gathering data on implementation of specific components of classroom instruction. District office and site staff are in the early stages of implementation for this monitoring strategy.
11. Training was provided by digiCOACH company staff to district Educational Services staff and principals on procedural use of the tool. Including input from site principals, district office staff worked with the company to customize an observation template that aligns with the district's instructional priorities. That template was completed, and Educational Services and site administrative staff began training in December 2021 using the district template.
12. To date, administrative training has involved discussion and practice application of the elements for focus, engagement, and differentiation. Each element was reviewed in some depth during the training sessions: discussion of what the element would look like, and sound like in the classroom; watching videos and comparing and discussing ratings for calibration purposes; expectations for parallel training with teachers on sites; expectation for how many classrooms to be visited before the next training session. Measurable frequency targets for observing the elements in classroom practice have not been set by the district based on documents provided to FCMAT from the training and calibration learning experiences.
13. Data provided to FCMAT from the digiCOACH program and interviews with site administrators and teachers demonstrated that there is considerable variance between school sites in the implementation of teacher training on the components of the tool and



its use for classroom observations. One principal reported that following an in-depth staff meeting discussion on the focus component, she continued monitoring only that element until she noted its application in 80% of the classrooms. At other sites, principals have moved forward to observe the three elements on which they have participated in district training. Most principals have not set specific measurable goals for evidence of classroom application. Some principals are meeting the district expectations for the number of observations to be completed while others have not completed any observations.

14. The district executive directors of elementary and secondary education meet with each of their assigned principals a minimum of once per month. There is no consistent system for the executive directors to frequently monitor/observe classroom instruction with the principals or to systematically review results of principals' classroom monitoring observation activities. There is also no district system to track how the directors and principals use the time during the meetings.
15. Documentation of principal classroom observation/monitoring activities is available through the digiCOACH platform. It is also possible in the platform to see feedback comments that were provided to teachers. There is no evidence that executive directors routinely review the documentation available or regularly discuss results of observation/monitoring visits with the principals regarding fidelity of program implementation.
16. There is some evidence of the monitoring of fidelity of program implementation in the delivery of content and instructional strategies at the classroom level, but the frequency and depth of that monitoring varies widely between school sites. Structures and clear procedures to ensure principal accountability for quantity and quality of this monitoring are not systematized.

## **Recommendations for Recovery**

1. The district should develop and implement clear verbal and written expectations/guidelines for how and when district level communications are to be shared with site instructional staff by principals (such as the CAO assessment and core instructional materials memos and videos). Whenever possible, elementary and secondary executive directors of education should attend site staff meetings when these key communications are presented and discussed to answer questions that may arise or to provide clarification as needed. At minimum, executive directors should review staff meeting agendas and sign-in sheets submitted to them by principals to validate that critical communication documents have been presented and discussed with teachers as required.
2. The district should put in writing the district procedure for obtaining approval for classroom use of supplemental instructional materials. Ensure that all Educational Services staff, principals, and teachers know the purpose of and the steps in the procedure.
3. The district should frequently revisit and monitor the common understanding of teacher and student behaviors that provide evidence of appropriate, quality implementation of the district-identified adopted instructional materials, effective first instruction, and the core



instructional practices. Ensure that the district-provided professional learning experiences model effective first instruction principles and that they include direct instruction (as appropriate to topic) and guided practice leading to independent practice with ongoing district coaching, support, and monitoring. Continue to require principals to collect and review lesson plans and hold principals accountable for that process as one strategy to monitor fidelity of program implementation. Develop written guidelines for principals and teachers on minimum district expectations for the lesson plan content and format (e.g., content standard for lesson, instructional materials to be used) aligned with the classroom observation tool elements. Communicate the purpose of lesson plan review and feedback to principals and teachers as a tool for the cycle of continuous classroom instructional practices improvement.

4. The district should establish classroom observations focused on monitoring fidelity of program implementation in the delivery of content and instructional strategies as articulated by the district as a high priority responsibility for district and site administrators. Increase the amount of time and human resources devoted to the development and effective implementation of a systematic, consistent, data-based monitoring and coaching process to accelerate continuous improvement of classroom instruction at all sites.
5. The district should to the greatest extent possible, increase the frequency of site visits by the executive directors of elementary and secondary education. Ensure that time is spent during each visit conducting classroom observations with site principals and providing coaching, follow up, and monitoring to improve classroom instructional practices. Document observations completed, measurable goals and action steps established for enhancing quality and effectiveness of classroom instruction, and coaching/follow up and monitoring activities focused on fidelity of program implementation.
6. The district should continue the focus on developing a clear, common understanding on the part of district and site administrators of the observable, measurable behaviors that provide evidence of effective implementation of the key elements on the district digiCOACH observation tool. Ongoing professional learning should include additional hands-on learning experiences for norming/calibrating use of the observation tool.
7. The district should establish quantitative frequency baseline measures for the digiCOACH observation tool elements for districtwide and individual school site levels. Formulate specific, measurable, attainable, relevant, and time-bound (SMART) goals for increasing the frequency and effective use of those elements during classroom instruction. Develop a system to assess progress toward meeting those established measurable goals (monthly, or on the six-week CoI calendar).
8. The district should collect site classroom observation data from principals at least monthly. Develop a system for that quantitative and qualitative data to be reviewed with each individual principal and his or her executive director of education. The executive directors of elementary and secondary education should submit summary data from their site observations (conducted with the principal) and those of each principal monthly for inclusion in the districtwide progress monitoring system. Review the progress monitoring data during Educational Services meetings, principals' meetings, meetings between

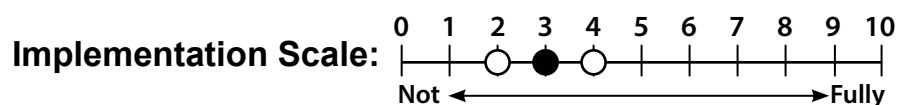


individual site principals and their executive directors of education, and at individual school site staff meetings with teaching staff. As each goal is reached, select another element/cluster of elements, and repeat the process.

9. The district should continue to provide professional learning to all teachers on the observable, measurable components of the digiCOACH classroom monitoring/ observation tool. Ensure that teachers clearly understand the rationale for the chosen components and what evidence demonstrates effective, high-quality classroom implementation of each of those components.
10. The district should as a component of the support from the executive directors of elementary and secondary education, provide site administrators with ongoing differentiated professional learning experiences on effective practices for instructional monitoring/ observations focused on the district instructional priorities. Emphasize the modeling and guided practice of providing individualized actionable feedback to teachers based on observation data and on coaching, follow up and/or other support strategies for teachers that result in increased program fidelity in the delivery of content and instructional strategies.
11. The district should ensure that all classroom observations result in specific feedback provided to individual teachers focused on the continuous improvement of all teachers in the delivery of effective first instruction, use of district-adopted instructional materials, and the use of the district selected core instructional practices. Monitor the effectiveness of feedback in changing classroom delivery of content and instructional strategies through the measurable goal setting and data collection process described above.

## Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 4.12 Assessment and Accountability

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### Professional Standard

Written policies and procedures are in place to ensure that special education processes are conducted pursuant to federal and state laws and that staff is provided appropriate, ongoing training to ensure proper implementation.

### Findings

1. The district has adopted policies and systematic procedures for identifying, screening, assessing, planning, implementing, reviewing, and performing triennial assessments of students in special education. The SELPA PPM has been board-adopted as the guiding document for the district. The manual provides detail on compliant practices for all special education procedures.
2. Special education staff received training during the 2021-22 school year focused on compliant and quality practices as described in the SELPA PPM noted above. Program specialists continue to work on school sites with principals and special education teachers to strengthen site-based implementation of compliant practices.
3. During the 2021-22 school year, there has been a continued focus on reducing the number of overdue IEPs. The executive director of special education provides a monthly update on the number of overdue IEPs districtwide and by school site. She reported to FCMAT that she now checks in weekly with principals to track on-time IEP completion. Program specialists are expected to meet with site principals prior to scheduled IEP meetings to assist the principals in preparing to facilitate compliant IEP meetings. Progress has been made in reducing the number of overdue IEPs, but district level special education staff described a continuous cycle of catch up and fall back behind that is an ongoing challenge.
4. During the 2021-22 school year, the district has not provided professional learning for general education instructional staff at school sites to ensure that they understand their role in appropriately implementing the district-adopted special education policies and procedures. Planning is in the early stages for moving the LRE district priority forward with training for special education and general education teachers and site administrators beginning in summer 2022.

### Recommendations for Recovery

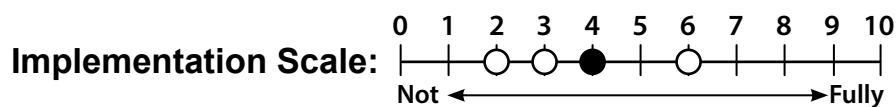
1. The district should continue to work with CDE, CCEE, and LACOE to resolve any issues of noncompliance.
2. The district should continue to closely monitor special education processes and program services moving forward to ensure they are conducted according to federal and state laws and that compliant and quality services are provided to identified students in special education in the LRE. Use the SELPA PPM to support this process.



3. The district should provide ongoing professional learning to site principals on compliant and quality special education procedures and instructional programming, including high-quality inclusive practices and ensuring that students in special education are served in the LRE.
4. The district should provide ongoing professional learning at each school site for general education instructional staff so that they fully understand what is required in ensuring that special education processes are conducted according to federal and state laws. Include current compliance and quality issues in the professional learning content, as well as information on the general education teacher's role in addressing those issues. Focus the professional learning content on high-quality inclusive practices and special education placement in the LRE.

### Standard Partially Implemented

July 2013 Rating:	6
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 5.1 Professional Development

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### Professional Standard

The LEA provides a continuing program of professional development to keep instructional staff, administrators, and board members updated on current issues and research pertaining to curriculum, instructional strategies, and student assessment.

### Findings

1. District office personnel have worked to provide multiple opportunities for professional learning for both elementary and secondary teachers.
2. The district has provided multiple opportunities for professional learning to classroom teachers regarding instructional delivery and ancillary support for students.
3. In addition to district-provided professional learning, many school sites provided site-specific professional learning for their staff.
4. Due to the pandemic, instructional coaches were needed as substitutes in classrooms. As a result of this, coaches could provide little of the “just in time” instructional support that is based on identified teacher needs and student data.

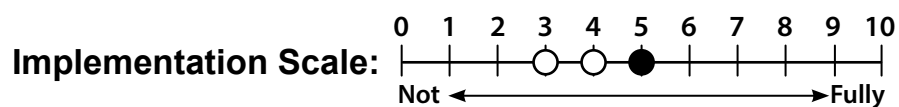
### Recommendations for Recovery

1. The district should continue to ensure that all school sites, administrators, and teachers participate in professional learning offerings to provide quality, equitable instruction for all students.
2. The district should establish clear expectations for the outcomes of professional learning and systems of responsibility and accountability at the school-site level so that all instructional staff will participate and implement the strategies learned.
3. The district should provide professional learning that specifically and intentionally augments and builds on previous professional learning to ensure that site processes and classroom instruction increases in quality.
4. Since there are many opportunities for professional learning, the district should continue to implement a comprehensive and cohesive plan for classroom implementation, including the CoI process utilizing instructional coaches. Special attention should be paid to ensuring that site instructional leaders are provided with professional learning to ensure that these efforts lead to sustaining improved instruction at the classroom level.



## Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 5.3 Professional Development

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### Professional Standard

The LEA provides opportunities and ongoing support for teachers to collaborate on the analysis and improvement of curriculum, instruction, and use of assessment data.

### Findings

1. The district has provided ongoing professional learning in the use of data gathered from various instructional platforms used by students.
2. Due to a substitute shortage, instructional coaches were needed as substitutes in classrooms. As a result, coaches did not have a great deal of opportunity to support teachers in their collaboration.
3. At the high school level, schools have begun the process of gathering data and working as departments to ensure that assessment data is used to inform instructional decisions.
4. Some school sites have strong systems of support for teacher collaboration based on analyzed student data.

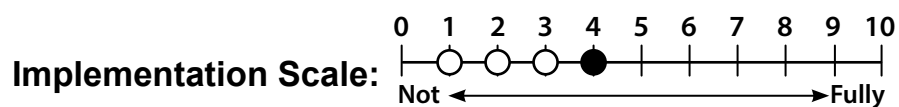
### Recommendations for Recovery

1. The district should continue to provide teachers with additional training and guidance to analyze student performance data. Special attention should be given to how data exemplifies learning and, necessarily, next steps for instruction at the classroom level.
2. The district should examine those sites where teacher collaboration based on student data is strong and use these sites as models for all sites.
3. The district should continue to develop systems of collaboration at the high school level. As an outcome of this collaboration, the district should provide professional learning and instructional supports that address any needs identified through this collaboration.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 5.5 Professional Development

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### Professional Standard

The LEA plan includes budgeted coherent professional development activities that reflect research-based strategies for improved student achievement and a focus on standards-based content knowledge.

### Findings

1. The district continues to provide access to research-based professional learning opportunities.
2. The district, in conjunction with outside entities, provides a variety of professional learning opportunities.
3. The district has focused on specific professional learning (e.g., designated ELD, PBIS) to increase student achievement.
4. The district is in the beginning stages of designing professional learning to support secondary-level instruction and the specific needs of teaching adolescents and specific content areas.
5. Due to a substitute shortage, instructional coaches were needed as substitutes in classrooms. As a result, coaches did not have a great deal of opportunity to support teachers in professional learning at the site level.

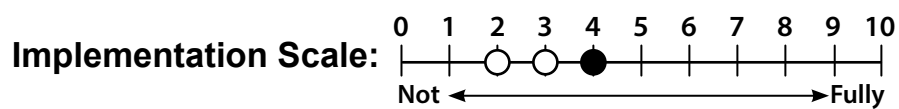
### Recommendations for Recovery

1. The district should continue to follow a comprehensive and cohesive plan to ensure that professional learning is centered on identified needs based on student data, content standards and research-based best practices for all students (see Standard 5.1).
2. The district should continue to ensure that there is a coherent and measured connection between professional learning and classroom implementation using classroom observations based on the district's focus goals.
3. The district should continue to ensure that professional learning is informed by the data collected through formative assessments and monitored frequently to ensure implementation at the classroom, instructional level.
4. The district should refine and implement a cohesive plan for professional learning specific to the secondary level, needs of adolescent learners and instructional design in the content areas.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 6.1 Data Management/Student Information Systems

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### Legal Standard

The LEA assigns and maintains Statewide Student Identifiers and maintains all data to be reported to the California Longitudinal Pupil Achievement Data System (CALPADS) and the Online Public Update for Schools (OPUS) necessary to comply with No Child Left Behind reporting requirements. (EC 60900(e))

While EC 60900 (e) continues to reference the No Child Left Behind Act (NCLB), former President Obama signed the Every Student Succeeds Act (ESSA) in December 2015, reauthorizing the Federal Elementary and Secondary Education Act (ESEA) and replacing the NCLB, the 2001 reauthorization of ESEA. The ESSA took effect beginning in the 2017-18 school year.

### Findings

1. Since the last review, the IT Department has been reorganized so that the executive director of IT, responsible for the oversight of CALPADS, Aeries, class scheduling, and attendance, enrollment and class counts, reports to the director of fiscal services. The district added a director of educational technology who reports to the CAO in Educational Services. The district has hired a database administrator who works with the executive director of IT to collect and report data.
2. For this review period, the district continued to assign the data collection positions to the school sites. Overall, site and district administration felt that enrollment and attendance is reflected more accurately, and schools have more support with this structure.
3. The district met timelines for all CALPADS submissions during this review period.

The district continues to have specialized data reviewers who review data in their area of expertise. The district continues to work to improve the quality of data reported. For the 2021-22 school year, the district changed the SEIS operator's position from a classified to certificated position responsible for SEIS/CALPADs data governance. An initial project for this position was the reconciliation of SEIS and Aeries to ensure that all students were appropriately identified and coded.

4. A review of the California School Directory on the CDE website found information for school sites and the district is up to date except for one school site, which experienced a midyear change in the principal. This directory is an online resource for obtaining contact and general information about schools and districts and is updated using the OPUS.

### Recommendations for Recovery

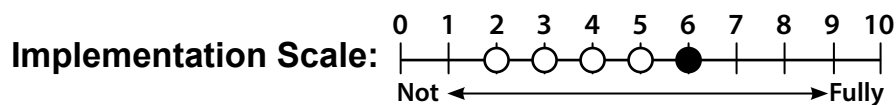
1. The executive director of IT and database administrator should continue to be provided with sufficient resources and assistance to ensure that the district can comply with the state requirements regarding maintaining statewide student identifiers and to work with the state regarding CALPADS and OPUS.



2. The district should continue to prioritize meeting all CALPADS reporting deadlines.
3. District staff should provide monthly training on the CALPADS processes and procedures manual to those responsible for entering data at school sites and other specialized departments and continue to concentrate on the quality of data entered into Aeries. Continue to monitor the implementation of processes at the school sites and provide additional training for any area identified as problematic.
4. The district should hold site administration accountable for reviewing and analyzing data specific to their school site. This is an additional layer of review for ensuring the accuracy of the data. The district should regularly review what data site administrators should review and the processes to follow if the data does not appear accurate.
5. The district should ensure that the information in OPUS accurately reflects administration any time changes are made.

### Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	2
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6









# **Table of Pupil Achievement Ratings**







Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.1 LEGAL STANDARD – PLANNING PROCESSES Categorical and compensatory program funds supplement and do not supplant services and materials to be provided by the LEA. (20 USC 6321)	2	2	5	6	6	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
1.2 LEGAL STANDARD – PLANNING PROCESSES Each school has a school site council, comprised of teachers, parents, principal and students, that is actively engaged in school planning. (EC 52050-52075)	2	2	4	4	5	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
1.4 PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA's policies, culture and practices reflect a commitment to implementing systemic reform, innovative leadership, and high expectations to improve student achievement and learning.	2	1	2	2	2	2	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4



Pupil Achievement Standards		July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.5	<b>PROFESSIONAL STANDARD – PLANNING PROCESSES</b> The LEA has fiscal policies and a fiscal resource allocation plan that are aligned with measurable student achievement outcomes and instructional goals including, but not limited to, the Essential Program Components. (Revised DAIT)	1	1	1	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
1.6	<b>PROFESSIONAL STANDARD – PLANNING PROCESSES</b> The LEA has policies to fully implement the State Board of Education-adopted Essential Program Components for Instructional Success. These include implementation of instructional materials, intervention programs, aligned assessments, appropriate use of pacing and instructional time, and alignment of categorical programs and instructional support.	2	1	2	3	3	5	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.8 PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA provides and supports the use of information systems and technology to manage student data, and provides professional development to site staff on effectively analyzing and applying data to improve student learning and achievement. (DAIT)	3	1	3	3	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
1.9 PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA holds teachers, site administrators, and LEA personnel accountable for student achievement through evaluations and professional development.	1	1	1	2	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	3
2.1 LEGAL STANDARD – CURRICULUM The LEA provides and fully implements SBE-adopted and standards-based (or aligned for secondary) instructional textbooks and materials for all students, including intervention in reading/ language arts and mathematics, and support for students failing to demonstrate proficiency in history, social studies, and science. (EC 60119, DAIT)	4	2	3	3	3	3	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	3



Pupil Achievement Standards		July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
2.3	PROFESSIONAL STANDARD – CURRICULUM The LEA has planned, adopted and implemented an academic program based on California content standards, frameworks, and SBE-adopted/aligned materials, and articulated it to curriculum, instruction, and assessments in the LEA plan. (DAIT)	4	2	3	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
2.4	PROFESSIONAL STANDARD – CURRICULUM The LEA has developed and implemented common assessments to assess strengths and weaknesses of the instructional program to guide curriculum development.	3	1	2	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
2.5	PROFESSIONAL STANDARD – CURRICULUM The LEA has adopted a plan for integrating technology into curriculum and instruction at all grade levels to help students meet or exceed state standards and local goals.	3	1	1	3	3	3	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.1 LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides equal access to educational opportunities to all students regardless of race, gender, socioeconomic standing, and other factors. The LEA's policies, practices, and staff demonstrate a commitment to equally serving the needs and interests of all students, parents, and family members. (EC 51007)	3	2	3	3	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
3.6 LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides students with the necessary courses to meet the high school graduation requirements. (EC 51225.3) The LEA provides access and support for all students to complete UC and CSU required courses (A-G requirement).	5	7	9	9	10	10	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
3.7 LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides an alternative means for students to complete the prescribed course of study required for high school graduation. (EC 51225.3)	5	7	8	9	10	10	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10



Pupil Achievement Standards		July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.10	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA has adopted systematic procedures for identification, screening, referral, assessment, planning, implementation, review, and triennial assessment of students with special needs. (EC 56301)	2	1	3	2	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	5
3.12	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES Programs for special education students meet the least restrictive environment provision of the law and the quality criteria and goals set forth by the California Department of Education and the Individuals with Disabilities Education Act. (EC 56000, EC 56040.1, 20 USC Sec. 1400 et. seq.)	6	2	2	2	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
3.13	PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES Students are engaged in learning, and they are able to demonstrate and apply their knowledge and skills.	2	1	1	3	3	3	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.15 PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA optimizes opportunities for all students, including underperforming students, students with disabilities, and English language learners, to access appropriate instruction and standards-based curriculum. (DAIT)	4	2	2	3	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	5
3.16 PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA makes ongoing use of a variety of assessment systems to appropriately place students at grade level, and in intervention and other special support programs. (DAIT)	2	1	1	2	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2
3.17 PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES Programs for English language learners comply with state and federal regulations and meet the quality criteria set forth by the California Department of Education.	2	2	2	2	2	3	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	5



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.18 PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA employs specialists for improving student learning, including content experts and specialists with skills to assist students with specific instructional needs.	3	1	3	4	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
3.22 PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA offers a multiyear, comprehensive high school program of integrated academic and technical study that is organized around a broad theme, interest area, or industry sector. (EC 52372.5, EC 51226)	5	5	3	3	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	7
4.3 PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY The LEA has developed summative and frequent common formative assessments that inform and direct instructional practices as part of an ongoing process of continuous improvement.	3	1	2	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>4.4</p> <p>PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY</p> <p>The LEA provides an accurate and timely school-level assessment and data system as needed by teachers and administrators for instructional decision-making and monitoring.</p>	4	1	3	4	5	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
<p>4.5</p> <p>PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY</p> <p>School staff assesses all students to determine students' needs, and whether students require close monitoring, differentiated instruction, additional targeted assessment, specific research based intervention, or acceleration.</p>	3	2	3	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
<p>4.10</p> <p>PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY</p> <p>The LEA and school site administration monitor fidelity of program implementation in the delivery of content and instructional strategies.</p>	4	2	3	4	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3



Pupil Achievement Standards		July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
4.12	PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY Written policies and procedures are in place to ensure that special education processes are conducted pursuant to federal and state laws and that staff is provided appropriate, ongoing training to ensure proper implementation.	6	2	3	2	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
5.1	PROFESSIONAL STANDARD – PROFESSIONAL DEVELOPMENT The LEA provides a continuing program of professional development to keep instructional staff, administrators, and board members updated on current issues and research pertaining to curriculum, instructional strategies, and student assessment.	4	3	4	4	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
5.3	PROFESSIONAL STANDARD – PROFESSIONAL DEVELOPMENT The LEA provides opportunities and ongoing support for teachers to collaborate on the analysis and improvement of curriculum, instruction, and use of assessment data.	3	1	1	1	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4



Pupil Achievement Standards	July 2013 Rating:	July 2014 Rating:	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.5 PROFESSIONAL STANDARD – PROFESSIONAL DEVELOPMENT The LEA plan includes budgeted coherent professional development activities that reflect research-based strategies for improved student achievement and a focus on standards-based content knowledge.	3	2	2	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
6.1 LEGAL STANDARD – DATA MANAGEMENT/ STUDENT INFORMATION SYSTEMS The LEA assigns and maintains Statewide Student Identifiers and maintains all data to be reported to the California Pupil Achievement Longitudinal Data System (CALPADS) and the Online Public Update for Schools (OPUS) necessary to comply with No Child Left Behind reporting requirements. (EC 60900(e))	4	3	4	2	4	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
<b>Collective Average Rating</b>	<b>3.23</b>	<b>2.03</b>	<b>2.87</b>	<b>3.32</b>	<b>3.68</b>	<b>3.94</b>	<b>3.87</b>	<b>—</b>	<b>3.87</b>	<b>4.48</b>







# Financial Management







## 1.1 Internal Control Environment

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### Professional Standard

All board members and management personnel set the tone and establish the environment, exhibiting high integrity and ethical values in carrying out their responsibilities and directing the work of others. Appropriate measures are implemented to discourage and detect fraud. (Statements on Auditing Standards (SAS) 55, SAS 78, SAS 82: Treadway Commission)

### Findings

1. Board policies and administrative regulations are a vital component of internal control and provide the guidelines and directives necessary for a district and its personnel to operate. The district subscribes to the CSBA's GAMUT online services, allowing board policies and administrative regulations adopted by the district to be accessed from a link on the district's website. The district has adopted several board policies, administrative regulations, and exhibits that demonstrate, support and communicate its intent to foster a behavioral culture of high integrity and ethical values including:
  - BB 9270-Conflict of Interest, revised on April 17, 2019. This policy outlines the requirements of governing board members and designated employees to annually disclose any conflict of interest that would preclude them from participating in any district related decision that includes that interest.
  - BP and AR 1310.1-Civility Policy, adopted on February 5, 2015, demonstrate in part the intent of the administration to set the tone and establish a foundation for an environment that, as stated in the policy, "promotes mutual respect, civility and orderly conduct among district employees, parents/guardians and the public."
  - BP and AR 3400-Management of District Assets/Accounts, adopted on August 4, 2014, recognize the importance of developing a system of internal control procedures that include separation of duties and fraud prevention, specifically in the areas related to recording or reporting transactions, which would include purchasing, receiving, and payment functions. Board Policies 3314-Payment for Goods and Services, updated April 17, 2019, and 3314.2-Revolving Funds, adopted August 4, 2014, also describe the board's fiduciary duties to manage and safeguard district assets and resources effectively.
  - BPs 4119.21, 4219.21 and 4319.21-Professional Standards, and their corresponding exhibits, further support the district's expectations of employees to conduct themselves ethically and appropriately. These policies encourage district employees to "accept as guiding principles the professional standards and codes of ethics adopted by educational or professional associations to which they may belong." Inappropriate employee conduct is also defined within these policies. Board Policy Exhibit 4219.21 was revised April 22, 2020 to remove reference to the



California School Employees Association as the district's classified bargaining unit representative and replaced that language with CalPro. The other BPs noted were last updated August 4, 2014.

The district has established a Board Policy Committee assigned the duties of reviewing policy updates as determined to be necessary and/or recommended by the GAMUT subscription service. The committee is led by the COO.

The district sends email communication to all staff identifying all new and amended board policies and administrative regulations approved by the county administrator/board and provides a link to the district website so staff can easily access and review changes. Several board policies and administrative regulations were revised during this review period.

Some policy revisions approved by the county administrator/board remain unchanged when accessed using the GAMUT online link. Interviews with staff indicate a lapse in board policy and administrative regulations updates as those responsibilities have been shifted from the service provider to the district personnel. This transition in responsibility has taken time as district staff had to be trained on the system and then catch up on uploading updates.

2. Board members and employees designated in the district's Conflict of Interest Code (BB 9270) are required by GC 87500 to annually file a statement of economic interests/Form 700 to disclose any assets and income that may be materially affected by official actions. Exhibit 9270 was revised February 27, 2020; however, the revised exhibit continues to conflict with the document accessible in GAMUT. The link accessible from the district's website connects to a "Resolution Adopting A Conflict Of Interest Code" dated September 19, 2018, which includes in its "APPENDIX" defined disclosure categories. The language in the two versions of the exhibit is incongruent. Inconsistencies continue between designated positions in both versions of the exhibit and the organizational charts provided for this review period. Inconsistencies remain between all three documents, including variations in titles and the omission or inclusion of administrative positions.

A best practice is to establish a list of generalized categories (for example, all senior executive director, executive director, director, and principal positions), but careful consideration should be given to developing this list to ensure all appropriate positions are included. Administrative positions with purchase authority are customarily included as designated positions. Modifying the list to include generalized categories that fit a more fluid organizational structure will improve clarity in positions required to submit Form 700.

The revisions to Exhibit 9270 also included modifications to disclosure categories. Three disclosure categories are described in both the exhibits reviewed; however, 13 of the 21 designated positions listed on the version posted to GAMUT are assigned disclosure categories that do not exist.



3. A list of specific employees, board members and consultants in designated disclosure category positions should be maintained to ensure forms are collected from all individuals required to file Form 700. The district does not maintain such a list. FCMAT was provided with completed Form 700s collected for the period January 1, 2021 through December 31, 2021. FCMAT's review of the forms provided continue to identify deficiencies. FCMAT noted several instances where forms were simply not completed correctly; for example, in Section 3 Type of Statement, the Annual box was simply checked. In many circumstances, the individual completing the form did not serve in the position for the entire calendar year, yet the period covered was left blank. Additionally, several forms were dated January 2021 although they were completed in January 2022. BB 9270 and GC Section 87302 provide for filing Form 700 annually and within 30 days of assumption of office and within 30 days of leaving office. The district does not have a process that ensures all employees assuming or exiting positions designated as required to complete Form 700s, do so. Form 700s were not provided to FCMAT for several appointments to designated positions during the period under review. In addition, while several positions were vacated during the timeframe under review, no Form 700s were provided for those staff members. (See Community Relations and Governance Standard 4.5 for further information.)
4. The district has greatly reduced the number of audit findings over the past several years. However, it continues to experience new audit findings classified as material weaknesses or significant internal control deficiencies. The district contracted with an independent accounting firm to conduct the required annual audit for the 2020-21 fiscal year. The audit report cites significant deficiencies in internal control in several functional areas of business practice that leave the district's assets susceptible to misstatement, theft, or fraud. The 2020-21 fiscal year audit contained eight audit findings, five of which were repeated or partially repeated from the prior year. However, one of the three new audit findings presented indicates a weakness in internal controls that limits access to information databases maintained by the district.
5. Formal operational policies and procedures help to establish protocols for completing, reviewing, and overseeing the business office's routine functions. When properly designed, implemented, and followed, written procedures improve the effectiveness of the internal control structure and offer reasonable assurance that the risk of fraud, misappropriation of funds or other illegal acts is reduced and that occurrences will be detected promptly.
6. The district has several departmental procedural manuals that provide written standards regarding processes for primary departmental duties. The procedures in these manuals support the basic processes for administrators and staff to follow, but are not standard operating procedures for the routine duties of each departmental employee's desk.
7. Interviews with staff indicated that some business office staff have resumed efforts in establishing and updating operational procedures for the Business Services Department. However, there is no established process or timelines for reviewing and updating procedures as changes within the department take place. Written processes and procedures for routine business activities are the foundation of strong internal controls, but will be ineffective unless implemented in practice, monitored, evaluated, and enforced.



Interviews with staff indicated that while board policy, administrative regulations and operational procedures may be established, issues exist since operational procedures are not applied consistently. Interviews with staff also indicate issues in holding school site and department administrators accountable to established procedures as executive management overrides the established procedures at its discretion. Management override of formally established policies and procedures weakens the district's system of internal control and increases the risk of misappropriation of funds.

8. Establishing and maintaining a fraud prevention program is essential to fraud deterrence. Tips from employees, either by reporting to supervisors or through use of an anonymous tip hotline, are common methods of detecting fraud. These methods are typically most effective when employees have access to, and are regularly made aware of, an anonymous tip line. The mere existence of such mechanisms is a highly effective fraud prevention technique.

The district does not have a formalized fraud prevention program. The district has available a program offered through its risk management provider called WeTip that promotes a hotline for anonymous reporting of tips related to crimes such as workers' compensation fraud, discrimination, harassment, threats, safety violations, burglary, and weapons. This program helps increase awareness of fraud prevention. However, interviews with district and site personnel clearly indicated the program is not actively promoted throughout the district, which has no other formalized fraud prevention and/or detection program.

9. The district has established annual employee notifications that incorporate sections addressing the district's Code of Conduct and Code of Ethics. The annual notifications are disseminated to all employees, including substitutes, and require each employee to complete an acknowledgement of receipt each year. The notifications communicate that "The Board of Education expects district employees to maintain the highest ethical standards, exhibit professional behavior, follow district policies and regulations, abide by state and federal laws, and exercise good judgment..." All employee handbooks include a section that speaks to the district's Code of Ethics.
10. Communication, training and routine monitoring of processes and procedures are essential to ensure control activities are successful and effective. Interviews with staff indicated that some district office staff members meet regularly with staff from other departments and school sites. Meetings with the Business Services, HR and Risk Management departments' staff are also frequently held to collaborate and discuss issues that cross departmental functions. Some business office personnel report progress towards evaluating and updating operational processes and procedures, but this practice is inconsistent across all disciplines.
11. At the time of FCMAT's fieldwork, the district did not have a functioning audit committee. There were plans for a committee to be established and start meeting the month following FCMAT's fieldwork, and the district appointed an advisory board member to the audit committee at the December 2021 board meeting. Establishing an audit committee can improve the district's system of internal controls by fostering an environment and culture that clearly communicates that fraud and other illegal practices will not be tolerated, and that all allegations will be investigated.



External audits and reports, internal reviews, or investigations can generate opportunities for growth and allow responsible staff to identify specific elements underlying the areas of concern and develop a collaborative plan to implement best practices. An audit committee can also serve as a body for monitoring the business office's progress on the corrective actions taken to address audit findings that identify weaknesses in internal controls, presenting opportunities for fraud, misappropriation of funds or other illegal practices.

## **Recommendations for Recovery**

1. The district should continue to routinely review and update board policies and administrative regulations. Department administration and management level staff should continue to actively contribute to the review and proposed revision of policies and regulations specific to their span of authority. The district should continue to modify standard language provided by CSBA's GAMUT policy service, tailoring each policy to the specifics of the district and removing all nonapplicable language.
2. The district should ensure that the online board policies, administrative regulations, board bylaws and exhibits reflect the most recently approved versions.
3. The district should ensure the designated position disclosure categories listed in Exhibit 9270 Board Bylaws, Conflict of Interest Code, and assigned disclosure categories accurately reflect positions maintained by the district. Where possible, designated positions should reflect generalized categories, such as "executive directors" and "directors," rather than specific positions. Designated positions should align with the organization's administrative structure presented in its organizational charts.
4. All designated positions should be required to complete Form 700 upon hire, annually and upon separation of employment. The district should establish a system that accounts for the completion and collection of these forms. The district should establish and routinely update a list of designated positions identified in Exhibit 9270 as responsible for completing Form 700. The list should identify all individual(s) employed in those positions during the calendar year and include their dates of hire/assignment and dates of separation of duty. This list should be updated any time position titles change and when staffing changes take place. Form 700 should be completed as part of the hiring and separation from employment processes managed by the HR Department, then forwarded to the staff member responsible for collection.
5. The district should ensure the employee(s) assigned responsibility for collecting the Form 700s are properly trained on the rules of submission, including the timeframe covered by the forms, who should complete the form, and how to review submissions to ensure they are complete, accurate and properly prepared.
6. The district should ensure operational procedures are implemented and monitored to make certain the district operates effectively and efficiently and that the established system of internal control adequately prevents, discourages, and detects fraud and safeguards district assets. The district should continue efforts in updating the comprehensive policies and procedures manual previously established by the Business Services Department.



During this process, all components of internal control should be evaluated, deficiencies should be identified, and procedures should be established to mitigate deficiencies in high-risk areas.

7. The district should review external audits, reports, and reviews with applicable staff to identify the specific elements underlying the areas of concern and develop a collaborative plan to implement best practices and resolve the audit findings.

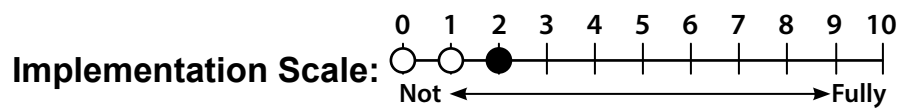
The district should routinely review, update and monitor operational procedures and provide staff training. The operational procedures should be followed by all employees and should not be overridden by management.

8. The district should implement a fraud prevention program and ensure that all district and school site staff are familiar with it. Written procedures should be established for retrieving the information reported, including a protocol for determining the level of investigation warranted; a means of determining who should perform an investigation; and procedures for reporting the results. The district should consider adding this to the annual policy review process.
9. The district should establish an audit committee as another level of oversight to help ensure proper operations and adequate follow-up to internal reviews and independent audit findings. Meeting agendas and minutes should be prepared and maintained.
10. Principals, office managers and other school site/department representatives who attend district and other informational meetings and/or are the primary recipient of communications regarding district-established policies and procedures should relay the information to all affected positions at their school site/department as soon as possible after receiving that information.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 1.3 Internal Control Environment

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### Professional Standard

The organizational structure clearly identifies key areas of authority and responsibility. Reporting lines in each area are clearly identified and logical. (SAS 55, SAS 78)

### Findings

1. The district maintains a districtwide organizational chart that as of January 26, 2022 outlines five divisions under the county administrator: the CBO, chief HR officer, CAO, COO, and chief of police. Each division also maintains separate organizational charts further identifying lines of authority. The charts identify established, but otherwise vacant positions.

The district provided three different organizational charts to FCMAT for this review period; one dated December 20, 2021, one dated January 5, 2022, and one dated January 26, 2022. The continual restructuring of the organization creates confusion for staff regarding lines of authority and hinders progress towards achieving organization-wide goals.

2. The district also identifies departmental leadership and support staff on its website. Inconsistencies in positions and/or position titles were noted when compared to organizational charts, some of which may be a result of the timing of changes and FCMAT's review. This creates confusion about the official authorized positions and/or staff members holding these positions.
3. District administrators, Business Services Department staff and school site administration and staff indicate they are aware of changes in district administration and understand who handles which tasks in the district office. School site staff reported being made aware of organizational changes as they occur. Interviews with school site staff members indicated that if they do not know who handles a specific matter, they can contact at least one source in the business office to be redirected to the appropriate individual.

### Recommendations for Recovery

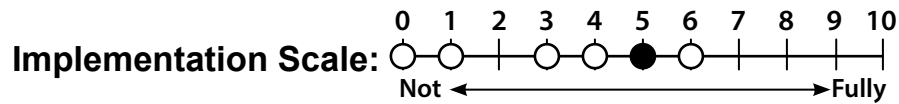
1. The district should continue to update the districtwide and division/department organizational charts when necessary to reflect staffing changes and to identify all management and district support staff positions under each division/department ensuring that lines of reporting are clearly identifiable. All organizational charts should include the date they are approved and/or revised by the county administrator/board.
2. The district should distribute organizational charts to all employees after each revision to help ensure staff understands changes as they take place and to communicate where to direct their questions.
3. Departmental leadership should communicate changes to reporting lines of authority when vacancies occur, even when temporary, and actively enforce the chain of command by directing questions through the appropriate department channels.



4. The district should establish a process that ensures its website is updated timely when changes in positions, titles, and/or staff are formally approved.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	3
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 2.1 Inter- and Intradepartmental Communications

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### Professional Standard

The Business and Operational departments communicate regularly with internal staff and all user departments on their responsibilities for accounting procedures and internal controls.

Communications are written when they affect many staff or user groups, are issues of importance, and/or reflect a change in procedures. Procedure manuals are developed. The Business and Operational departments are responsive to user department needs.

### Findings

1. The district office administration continues to work to improve cohesive communications between the Business Services and Operational departments and other departments and school sites. Although there have been some difficulties because of the pandemic and numerous new employees, interviews with department and site staff indicated that business office staff members are typically responsive to requests for information. During this review period, the electronic personnel requisition process in the Informed K12 software system has been revised to include fewer steps to help streamline the procedure and improve communication. In addition, two Business Services Department memos that include accounting, budget, payroll and purchasing information and updates were sent to school principals and secretaries.
2. The CBO has been with the district since September 2020 and oversees the Fiscal Services, Facilities, and Food Services departments. During this review period, the former IT Department was split into two departments: IT and Educational Technology. The new IT Department and the Maintenance, Operations and Transportation Department were reassigned and are now overseen by the CBO. At the time of FCMAT's fieldwork, the department head of one of the departments was vacant, one was recently promoted to the position, one had been with the district approximately five months, and two had been with the district for slightly more than a year. Additionally, nine of the 16 positions in the business office were filled and/or refilled during this review period, and there were no vacant positions at the time of FCMAT's fieldwork. Interviews indicated that the CBO continues to be in meetings most of each day, which makes it difficult to complete necessary business functions, to build staff capacity, and for people to access him when needed.
3. The CBO attends the districtwide principals' meetings and conducts monthly meetings with each principal to discuss budgets, staffing and other school site responsibilities. Interviews indicated that these meetings have been well received and routinely include staff from the Business Services and Educational Services departments based on the topics discussed. During this review period, the CBO began meeting with some department leaders routinely. It would be beneficial for the CBO to schedule routine meetings, for example quarterly or biannual, with each department leader to discuss their budgets and other department responsibilities related to procedures for areas such as accounting, internal controls, purchasing and payroll.



4. Office managers and administrative secretaries continue to have monthly meetings, where various district departments, including Business Services, share information regarding departmental processes and procedures. The 2020-21 and 2021-22 meeting calendars indicate that the meetings have been conducted virtually and that they are mandatory; however, no attendance rosters were provided to FCMAT.
5. The senior executive director of fiscal services meets periodically with various individuals in the business office as needed but has not yet scheduled routine business office staff meetings.
6. Interviews with staff indicated that interdepartmental communications between the Business Services and HR departments have sometimes been lacking during this review period. Leadership continues to work to assess interdependent activities and procedures, evaluate their effectiveness and revise existing or establish new procedures. In addition, applicable staff members from the two departments meet routinely to discuss various topics such as employee leaves and position control. Although the reconciliation process was not yet complete at the time of FCMAT's fieldwork, staff have worked diligently during this review period to update and reconcile position control.
7. The Business Services and HR departments continue to use a shared drive where department staff members can access documents that affect duties between the departments, and group emails are used to share information based on assigned functions.
8. The Inglewood Unified School District Administrative Handbook is now accessed by a link on the HR Department website and requires login information. FCMAT's finance team could not access the handbook, but it had previously included a section for the Business Services Department, which had numerous links to items such as the districtwide directory with administrator and support staff names and contact information, procedures and forms. Some of this information is now posted on the district's website under various Business Services and other headings. The website contains business office staff names, contact information and major job duties as well as numerous reports and forms of interest to districtwide staff and those affected. However, it does not include all the processes and procedures regarding site and department business functions, and some of the information, such as staff names, was outdated at the time of FCMAT's fieldwork.
9. The senior executive director of fiscal services continues to work with staff to develop the Business Services Division Procedure Manual, which includes sections for accounting, budget, payroll and purchasing. The unfinished manual is reportedly available to business office staff on the district's shared drive, but it is unclear if this procedure manual will also serve as a desk manual for each business office position.

## **Recommendations for Recovery**

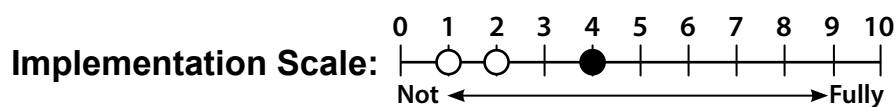
1. The district should continue to develop and enhance efforts to establish a systematic process for effective communication between the Business Services and Operational departments and between business office departments and school sites.



2. The district should reduce the number of meetings that require the CBO's attendance.
3. In addition to routine meetings with each principal, the CBO should schedule and conduct meetings with each division/department leader to review his or her budget and responsibilities for internal controls and operational procedures.
4. The district should continue making the monthly office manager and administrative secretary meetings mandatory.
5. The district should ensure that business office staff meetings are routinely scheduled and conducted.
6. The Business Services and HR departments' staff should continue to meet and reconcile the position control system and ensure it is consistently and accurately maintained.
7. The district should publish a handbook that includes business office processes and procedures for school sites and departments in a centralized online source. The handbook should be reviewed and updated at least annually.
8. The district should continue to establish formal written procedures for the business office and ensure that desk manuals are developed and include current policies and step-by-step procedures for all business office functions. Manuals should be reviewed and updated at least annually and as changes occur and should be posted in a centralized online source.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	2
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 2.3 Inter- and Intradepartmental Communications

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### Professional Standard

The board is engaged in understanding the fiscal status of the LEA, for the current and two subsequent fiscal years. The board prioritizes LEA fiscal issues, and expects reports to align the LEA's financial performance with its goals and objectives. Agenda items associated with business and fiscal issues are discussed at board meetings, with questions asked until understanding is reached prior to any action.

### Findings

1. All seats on the district's five-member elected board, referred to as an advisory board, are filled. All five advisory board members have completed the CSBA Masters in Governance program. The program includes courses in the following areas: Foundations of Effective Governance/Setting Direction, Student Learning & Achievement/Policy & Judicial Review, School Finance, Human Resources/Collective Bargaining, and Community Relations & Advocacy/Governance Integration.
2. A review of the agendas and minutes posted on the district's website indicates 16 board meetings occurred from March 2021 through January 2022; no special board meetings were conducted, and two of the 16 regular meetings included a board workshop. Minutes show that four or more members were present at all the meetings; minutes for the September 8 and October 27, 2021 meetings had not been approved and/or posted at the time of FCMAT's fieldwork. It is essential for the advisory board members to continue to regularly attend meetings to gain a broader understanding of their role and the district's fiscal matters.
3. Interviews with the county administrator and advisory board members indicated that the board members are engaged and ask questions at meetings. Board meeting minutes indicated that the board provides comments about items such as the budget and interim reports and cash flow during the reports/presentations portion of the agenda. In addition, the county administrator and cabinet meet with each board member individually prior to board meetings to provide an opportunity for members to ask questions.
4. Many of the district's routine fiscal matters such as approval/ratification of purchase orders, approval of vendor/payroll warrant resolutions, approval/ratification of travel expenditures/conference requests, and numerous contracts and consultant agreements are presented at regular board meetings. During this review period, items regarding the district's fiscal condition, including the budget adoption, interim reports and unaudited actuals were also presented at regular, rather than special, board meetings. These items should continue to be on regular board meeting agendas since dates for these meetings are typically determined each December and allow advisory board members and the public more time to schedule attendance and review agendas and backup materials. Items on the district's fiscal condition are presented as consent calendar/action items on the



board meeting agendas, and items such as the budget, interim reports and unaudited actuals are also included on the reports/presentations portion of the agenda preceding county administrator action on the issue. As indicated above, advisory board members are encouraged to discuss and ask questions regarding agenda items.

5. Interviews continue to indicate that board agendas and backup materials are provided at least 72 hours (usually on Sundays) before each regular board meeting. This is consistent with the letter of the law; however, board agendas and their attachments can reach hundreds of pages. Board agendas and materials, including budget documents and the assumptions narrative for each reporting period, should continue to be provided to advisory board members before board meetings and with sufficient time to review documentation, formulate questions and prepare for discussion. Budget issues are discussed in further detail in the budget sections of this report. (See also Standard 6.6 of the Community Relations and Governance section for additional information.)
6. Board meeting agendas and minutes are available through links on the district website. Supporting documentation, including that associated with business and fiscal issues, is also available through links embedded in each agenda. FCMAT's review of agendas and minutes for meetings conducted from March 2021 through January 2022 found that information regarding the rationale and financial impact of items is included on the board agendas.
7. The December 15, 2021 board meeting minutes included designations of board representatives to serve on district committees; one board member was appointed to continue to serve on the Budget Advisory Committee. The 2021 Budget Advisory Committee member list includes two board members. District documents show that four committee meetings were conducted during this review period, and that one or two board members attended each meeting. Additionally, the board appointee provided updates about the Budget Advisory Committee at four board meetings.
8. The district conducted two board workshops during this review period, which included information about the role of the board, board protocols, effective communication, the Brown Act, and an overview of the negotiations process. However, the workshops did not include a budget study session. Although district staff provide budget presentations to the county administrator/board, these presentations are usually brief and specific to the budget that is presented for approval at each given reporting period. Budget study sessions/workshops typically provide more global as well as detailed information about the entire budget process, such as how the budget is structured and developed, and budget terminology. These sessions/workshops also provide more time for the board to ask questions regarding the district's budget and related processes.

## **Recommendations for Recovery**

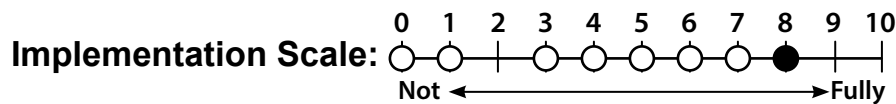
1. Advisory board members should continue to attend all board meetings and continue to actively demonstrate a desire to learn about all fiscal matters presented.



2. Items regarding the district's fiscal condition, such as the adoption budget, interim reports and unaudited actuals, should continue to be included on regular board meeting agendas.
3. The district should continue to provide board agendas and materials to advisory board members before board meetings as required by law and ensure that materials are provided with sufficient time for review and preparation for discussion.
4. The Budget Advisory Committee should continue to include representatives from the advisory board.
5. The district should routinely conduct, and the advisory board members should attend budget study sessions/workshops to learn more about the district's budget, financial condition and fiscal decisions.

### Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	8





## 3.1 Staff Professional Development

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### Professional Standard

The LEA has developed and uses a professional development plan for training business staff. The plan includes the input of business office supervisors and managers, and identifies appropriate training programs. Each staff member and management employee has a plan designed to meet their individual professional development needs.

### Findings

1. The district does not have a formal staff development plan for the business office. However, the business office has developed the Inglewood Unified Professional Development Plan Business Services Department template, which states "... Business Services will ask all management employees to work with their supervisor or administrator to develop a Professional Development Plan." Although the template indicates it is for management employees, it was completed by numerous business office staff members and managers during this review period. The template also states, "Your supervisor or administrator will help guide the process and approve the trainings ..." Based on the plans provided, it is unclear if supervisors and administrators helped guide the process for each employee, and some business office staff members did not complete a professional development plan.

2. Board Policy 4331 (adopted August 4, 2014) states the following:

The Superintendent or designee shall develop a plan for administrator support and development activities based on a systematic assessment of the needs of district students and staff and aligned to the district's vision and goals.

This policy addresses staff development for management, supervisory and confidential personnel. Administrative Regulation 4331 (adopted August 4, 2014) identifies the following as potential methods of professional development:

- Professional education conferences or committee meetings
  - Courses offered by institutions of higher education
  - Workshops offered by the district, county office of education, or state
  - Small-group activities
  - Self-directed learning
  - Observation of other schools
  - Follow-up activities that help staff implement newly acquired skills
3. Board Policy 4231 (adopted August 4, 2014) states "Classified staff shall have opportunities to participate in staff development activities in order to improve job skills, retrain to meet changing conditions in the district, and/or enhance personal growth."



Administrative Regulation 4231 (adopted August 4, 2014) identifies the following potential staff development opportunities:

- Orientation and support for new employees
  - Visits to other schools and school districts
  - Attendance at professional conferences or committee meetings
  - Classes and workshops offered by the district, county office of education, institutions of higher education, private organizations, or other appropriate agencies
  - Joint staff preparation time and staff meetings
  - Follow-up activities that help staff implement newly acquired skills
4. Professional development training lists for 2020-21 and professional development plans for 2021-22, completed by some business office staff members, show the names and dates of workshops attended, and training provided by district staff and consultants. The workshops attended by staff members were offered by various organizations including the county office of education, California Association of School Business Officials, Frontline, and School Services of California.
  5. Assessing procedures for core business office functions and establishing or modifying systematic procedures includes evaluating the skill levels of individual staff members for assigned duties. Interviews continue to indicate that staff members desire or need training and/or additional training in several areas, including those related to procurement practices and regulations, the financial software system, payroll, and ASB oversight.

## **Recommendations for Recovery**

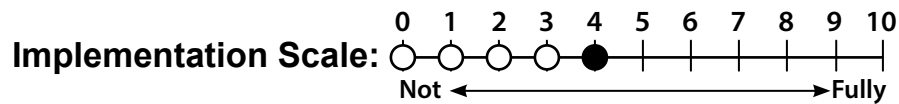
1. A formal staff development plan should be developed for the Business Services Department targeted to specific district goals and/or objectives. The district should evaluate the skill levels of each staff member. The focus should be on content areas where deficiencies were previously identified during employee performance evaluations and with deficiencies noted in the annual audit reports or other regulatory agency reviews. The input of business office supervisors and managers should also be used to identify appropriate training and cross-training programs that meet the identified professional development needs of staff members.
2. Appropriate resources should be identified to fund the training included in the staff development plan.
3. The business office staff should continue to attend routine trainings offered by the county office and other professional organizations and seek additional fiscal training and guidance to develop and enhance sound business practices and technical skills.



4. The district should continue its work to incorporate professional development activities into a formal staff development plan for each business office staff member and manager. These plans should include a calendar of training offerings and dates that each individual is scheduled to attend to fulfill professional development expectations.

## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 3.2 Staff Professional Development

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### Professional Standard

The LEA develops and uses a professional development plan for the in-service training of school site/department staff by business staff on relevant business procedures and internal controls. The plan includes a process to seek input from the business office and the school sites/departments and is updated annually.

### Findings

1. The district has not established a formal staff development plan for the business office staff to provide training to school site/department staff. However, on February 9, 2021 the Business Services Department hosted a training for site/department staff. The meeting included topics such as budget, purchase requisitions, accounts payable, extra duty timesheets, personnel requisitions and attendance reports. An attendance roster was not provided to FCMAT, so it is unknown who attended the training. At the time of FCMAT's fieldwork, the business office was planning to provide an in-service training in February 2022, which reportedly would include more detailed information about business-related functions. The January 7, 2022 memorandum sent to school site and department office staff requested that individuals email the business office with any topics they would like to have included regarding their specific needs about the district's business procedures. Business office staff also indicated that 1-on-1 training is provided to site and department staff as requested and/or as needed for various business functions.
2. Office manager and administrative secretary meetings are conducted by the HR Department at which district departments, including Business Services, provide training regarding district forms, processes and procedures. The 2020-21 and 2021-22 calendars of scheduled meeting dates indicate that the meetings are mandatory and are typically scheduled monthly. However, no attendance rosters were provided to FCMAT, so it is unknown if all required attendees were present at each meeting. Interviews with site and department staff indicated the meetings are generally well received.
3. Interviews with school site/department administration and support staff indicated that some individuals need initial or additional training in areas such as the financial system, budget, ASB and the student information system. School site/department staff should receive routine guidance and training in all content areas related to business activities including, but not limited to, budget management, procurement, enrollment and attendance, and ASB, as applicable. A best practice is to ensure all staff members receive annual trainings to update or correct routine practices. Additionally, staff member turnover or movement within a district is not uncommon, and all staff members who are new to the district, site/department or position should receive training upon assuming the position.

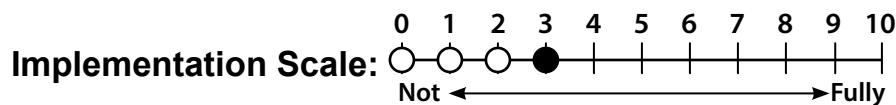


## Recommendations for Recovery

1. A formal professional development plan should be established for the business office staff to provide school site/department staff with in-service training on relevant business procedures and internal controls.
2. The district should ensure that the staff development plan includes a process to seek input and identify the professional development needs of school site/department staff and is updated annually.
3. The district should ensure that all applicable school site/department staff members receive annual trainings to update or correct routine business practices, and all staff members who are new to the district, site/department or position should receive training upon assuming the position. It should also consider making attendance at these trainings mandatory for all applicable staff members and ensure that attendance rosters are completed for all trainings.

## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	3





## 4.2 Internal Audit

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### Professional Standard

Internal audit findings are reported on a timely basis to the audit committee, board and administration, as appropriate. Management then takes timely action to follow up and resolve audit findings.

### Findings

1. The primary objective of an internal audit is to provide the district management with an independent assessment of monitoring systems, review procedures, authorization processes, and organization risk and controls. Internal audits also provide an opportunity for the district to improve and mitigate overall risk, including the detection of fraud or misappropriation of funds by employees in the normal course of business.

The district has assigned the function of internal audit to the director of fiscal services position. At the time of FCMAT's fieldwork, the individual in this position did not have the capacity to implement a formalized internal audit program due to limited time availability. However, during the period under review, the director did complete a review of attendance records for a sampling of school sites for the 2020-21 fiscal year. FCMAT was provided with a two-page summary of findings for this review, which identified missing documentation but did not provide any details of testing. A second review of the same sampling of school sites was conducted less than a month later. The findings were summarized in the same manner and cited many of the same findings noted in the first review. No quantification of findings and no recommendations were provided in either summary; therefore, assessment of any corrective action taken could not be determined.

The county administrator should fully implement an internal audit program and an audit committee (as recommended in Standard 1.1). Internal audits should first be focused on those areas of weakness identified in the district's annual independent audits to ensure organizational risk is minimized, and policies, procedures, laws, and regulations are followed. Internal audit reports or summaries should include sufficient quantifiable detail so that progress is measurable upon follow-up. Detailed recommendations should also be described. Internal audit findings should be resolved in a timely manner to the satisfaction of an audit committee. Additionally, procedures should be established to prevent any similar findings from occurring in the future.

2. Management is responsible for resolving any findings and recommendations from the district's annual independent audit. The district does not have an audit finding board policy or administrative regulation that establishes the procedure to address audit findings in a timely manner. There is no formalized process that assigns responsibility for correcting the findings to specific employees. Upon receipt of the annual audit report the district should do the following:
  - Identify the department and staff member assigned to address each specific audit finding.



- Document the details about when the audit finding was discussed with the affected department, a proposed audit finding resolution date and the actual date of audit finding resolution.
- Document administrative verification that the corrective action for each audit finding has been implemented.

A copy of the documented audit resolution should be provided to the district audit committee and the audit firm.

Annual audit findings should be presented to the audit committee, and internal audit/ follow-up should be completed to ensure audit finding corrective action plans are implemented and resolved in a timely manner to the satisfaction of the audit committee. Additionally, operational procedures should be reviewed and updated to prevent similar findings from occurring in the future.

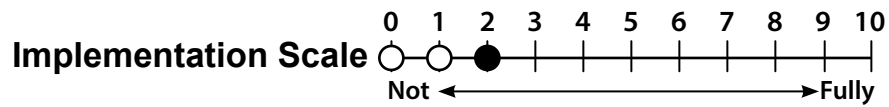
## **Recommendations for Recovery**

1. The district should adopt board policies and administrative regulations to establish an internal audit function and ensure that internal audit practices are fully implemented.
2. The district should develop an audit finding board policy and/or administrative regulation and incorporate an audit finding resolution worksheet to establish procedures for resolution. The procedures should clearly describe the process for conducting internal audits including the format for reporting findings and recommendations, and the process for resolving internal and external audit findings. The policy should require “timely” resolution, and “timely” should be clearly defined.
3. The district should establish an audit committee that is responsible for monitoring internal and external audit findings.
4. Internal and external audit findings should be reported to an audit committee, which should then report to the county administrator/board. If circumstances merit such action, the county administrator should report possible irregularities that may warrant a fraud audit to LACOE for further investigation.
5. The district should ensure it has sufficient qualified staff in the Business Services Department who are trained and cross-trained to fully implement and expand internal audit practices to improve weaknesses in control activities identified in audit findings and this report.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	1
July 2018 Rating:	1
July 2019 Rating:	1
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	2





## 5.1 Budget Development Process

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### Professional Standard

The board focuses on expenditure standards and formulas that meet the goals and maintain the LEA's financial solvency for the current and two subsequent fiscal years. The board avoids specific line-item focus, but directs staff to design an entire expenditure plan focusing on student and LEA needs.

### Findings

1. As discussed in Standard 2.3, a representative from the advisory board has been appointed to serve on the Budget Advisory Committee, and members' attendance and participation at board meetings has continued during this review period. Interviews indicated that board members are involved and ask questions at meetings and continue to learn about the budget and the district's financial condition and that some board members also attended the California School Boards Association's annual conference during this review period.
2. The online agenda for the March 10, 2021 regular board meeting included the approval of the 2020-21 second interim budget report and provided a PowerPoint presentation, the standardized account code structure (SACS) documents and a written narrative as attachments. The PowerPoint presentation contained information such as the budget and financial reporting cycle, certification status, a summary of budget changes from one reporting period to the next, summary combined general fund budget and MYFP totals, and cash flow projections for the current year. The narrative report included information about a few of the major assumptions used to develop the budget and MYFP, and the updated FSP. The meeting minutes indicated that the CBO gave a presentation regarding the second interim report and that the advisory board provided comments regarding the item prior to its approval by the county administrator with a positive certification.
3. The online agenda for the June 30, 2021 regular board meeting included the adoption of the 2021-22 budget and provided a PowerPoint presentation, the SACS documents and a written narrative as attachments. The PowerPoint presentation contained an explanation of some key budget terminology and information such as the budget and financial reporting cycle; legal requirements; a budget summary for the unrestricted, restricted and combined general fund; an MYFP summary for the unrestricted and combined general fund; and cash flow projections for the current and budget years. The narrative report included information about many of the major assumptions used to develop the budget and MYFP, and the updated FSP. The meeting minutes indicated that the CBO gave a presentation regarding the budget and that the advisory board provided comments regarding the item prior to its approval by the county administrator.
4. The online agenda for the December 15, 2021 regular board meeting included the approval of the 2021-22 first interim budget report and provided a PowerPoint presentation, the SACS documents and a written narrative as attachments. The PowerPoint presentation contained an explanation of some key budget terminology



and information such as the budget and financial reporting cycle, certification status, a summary of budget changes from one reporting period to the next, summary unrestricted general fund budget and MYFP totals, and cash flow projections for the current year. The narrative report included information about most of the major assumptions used to develop the budget and MYFP, with local rates for staff step and column costs and employee benefit changes, and the updated FSP. However, assumptions for some items (i.e., Mandate Block Grant and interest rates for 10-year treasuries) differed between the tables in the narrative. Therefore, it is unclear which assumptions were used in the budget and MYFP for these items. The meeting minutes indicated that the CBO gave a presentation regarding the first interim report prior to its approval by the county administrator with a positive certification.

5. The SACS report format is highly technical, complex and difficult to read, necessitating some guidance and explanation. Additionally, the SACS report alone does not demonstrate the link between the budget and the district's standards, goals and student needs. As indicated above, a PowerPoint presentation and written narrative were also provided at each reporting period, and the CBO made presentations at each of the board meetings to help communicate financial information. The information provided in the online agenda backup materials at each reporting period should consistently include all the major assumptions used to develop the budget and multiyear projection. This will allow the advisory board, staff and public to understand how the educational goals are reflected in the budget. A properly prepared presentation can demonstrate the district's progress towards fiscal solvency, isolate areas of concern, and focus on expenditure standards, formulas and student and district needs.
6. The county administrator sends a weekly memo to the district's board members. The documents provided to FCMAT show that the memos include updates provided by the Business Services Department about construction projects, food service and the Alternate Income Form. The memos also include updates from other departments about topics such as student enrollment and attendance, negotiations, special education, IT and the LCAP.

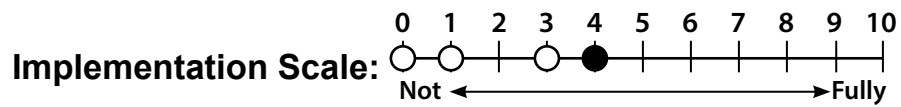
## **Recommendations for Recovery**

1. The district should conduct, and the advisory board members should attend board study sessions/workshops to receive more detailed information on their role in developing the budget and its connection to student achievement. The advisory board members should also continue to attend outside budget workshops.
2. In addition to all the SACS forms, the district should consistently provide board members a written narrative that includes comprehensive financial information in an understandable format and the complete set of major assumptions used to develop the budget, interim reports and multiyear financial projections. This information should be provided in the online agenda backup materials.
3. The district should continue to revise its FSP as needed and implement the plan to ensure fiscal solvency, include the advisory board and community throughout the process, and ensure the plan is approved by the county administrator.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	3
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 5.2 Budget Development Process

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### Professional Standard

The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.

### Findings

1. One of the most powerful ways to gain input regarding budgetary and instructional issues from those affected, including the board, staff, community and employee associations, is the LCAP, a comprehensive district plan that must be aligned with the budget. Per Education Code Section 52060, the district's LCAP (as well as the LCAP for each district-operated charter school) is to include a description of its annual goals for pupils to be achieved for each of the state priorities and for any additional local priorities. The LCAP should provide district staff with the information necessary to develop a budget and to accomplish the actions necessary to achieve the district's goals. The following depicts how the plan was handled at the district during this review period:
  - A public hearing for the proposed 2021-22 LCAP was held at a regular board meeting on June 23, 2021. The minutes indicated that no public comments were made during the hearing. Prior to the public hearing, the interim executive director of federal and state programs presented the LCAP, and the minutes indicated the board provided comments regarding the presentation and that all five of the advisory board members were at the meeting.
  - After a presentation by the interim executive director of federal and state programs, the county administrator adopted the 2021-22 LCAP at the June 30, 2021 regular board meeting, prior to adoption of the 2021-22 budget. The minutes indicated that no public comments were made regarding the LCAP during the public comments portion of the meeting. The minutes show that all five of the advisory board members were at the meeting.

Standard 6.1 of this report provides additional information on the public hearing and adoption processes for the LCAP and budget.

2. Education Code Section 52060 states the following:

The governing board of a school district shall consult with teachers, principals, administrators, other school personnel, local bargaining units of the school district, parents, and pupils in developing a local control and accountability plan.

Such meetings are opportunities to involve the board, community, employee associations, and other affected parties to satisfy the required LCAP engagement, seek input for budget development, and build transparency.



The 2021-22 revised LCAP was approved at the September 15, 2021 board meeting and indicated that eight stakeholder engagement meetings were conducted from March 15 through June 15, 2021. The LCAP indicated that stakeholder engagement groups included: the DELAC, parent advisory councils, bargaining units, school and district administrators, SELPA and community members. The plan also indicated that student participation was obtained primarily through student surveys.

3. The district continues to have a Budget Advisory Committee, and district documents show that four meetings were conducted during this review period. The 2021 Budget Advisory Committee member list indicated that committee membership included the county administrator, two board members, district and school site administrators, bargaining unit representatives, a parent, students, and facilitators from the business office. Meeting minutes indicated that the committee discussed the 2021-22 proposed budget prior to its presentation at a board meeting, and that the 2020-21 second interim report and unaudited actuals and 2021-22 45-day budget revisions were discussed following their approval at the respective board meetings. Budget Advisory Committee minutes also indicated that time is provided for comments and suggestions. At the time of FCMAT's fieldwork, meetings had not yet been conducted in 2022.

The 2021-22 Budget Development Calendar adopted at the February 17, 2021 board meeting includes dates for Budget Advisory Committee meetings and for individual meetings with principals to discuss their site budgets and staffing. Interviews indicated that the monthly meetings with each principal to discuss their budgets, staffing and other school site responsibilities have continued during this review period. These meetings include staff from the Business Services and Educational Services departments based on the topics discussed. The calendar does not indicate that budget input is requested from department leaders regarding their budgets; however, some cabinet members stated that input is provided during cabinet meetings.

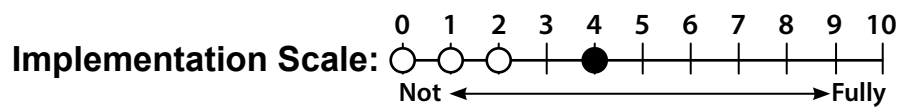
## **Recommendations for Recovery**

1. The district should continue to actively seek input from the advisory board members, parents, students, community, staff and bargaining units during the budget development and LCAP process.
2. The district should continue to ensure that the LCAP guides budget development and is incorporated in the budgeting process.
3. The district should conduct timely meetings with all department managers and continue to conduct timely meetings with site administrators regarding budget development.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 5.3 Budget Development Process

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### Professional Standard

The LEA has clear policies and processes to analyze resources and allocations to ensure that they align with strategic planning objectives and that the budget reflects the LEA's priorities. The budget office has a technical process to build the preliminary budget that includes revenue and expenditure projections, the identification of carryovers and accruals, and any plans for expenditure reductions. The LEA utilizes formulas for allocating funds to school sites and departments. This may include staffing ratios, supply allocations, etc. Standardized budget worksheets are used to communicate budget requests, budget allocations, formulas applied and guidelines. A budget calendar contains statutory due dates and major budget development milestones.

### Findings

1. Board Policy 3000-Concepts and Roles (adopted August 4, 2014), states the following regarding budget development:

In the development of a district budget, the Board and the Superintendent or designee shall establish a calendar that reflects the full budget cycle and a process that satisfies the requirements of law, including opportunities for public input. The Superintendent or designee shall provide fiscal data and prepare a proposed budget document within the budget priorities and parameters set by the Board. The Board shall adopt a budget that is aligned with the district's vision and goals and enables the district to meet its fiscal obligations.

Board Policy and Administrative Regulation 3100-Budget, were adopted on February 20, 2019. These documents are specific to budget development and adoption, outline the budgetary responsibilities of the board and provide staff with specific direction for these processes.

2. As discussed in Standard 5.2, the LCAP lists the district's goals and actions to achieve those goals; therefore, the LCAP should be an integral component of the budget. The district adopted its 2021-22 LCAP at the June 30, 2021 board meeting; the revised 2021-22 LCAP was approved at the September 15, 2021 board meeting and included the LCFF Budget Overview for Parents. The agenda backup materials included a PowerPoint presentation with information regarding projected revenue and stated that the "LCAP drives the District's spending plan." Interviews with district administration indicated that the budget and LCAP are aligned, the SACS criteria and standards forms for the 2021-22 adopted budget indicate that the district's budget includes the expenditures necessary to implement the LCAP, and the September 15, 2021 oversight letter indicated that the county office approved the district's LCAP. However, the 2021-22 budget and first interim assumptions narrative documents and PowerPoint presentations do not include discussion of the LCAP, so readers cannot easily discern the extent of its inclusion in the budget at each reporting period.



3. The FSP is a multiyear strategic blueprint critical to the district's ability to regain fiscal solvency. The 2021-22 adopted budget narrative includes the updated FSP, and the document was provided with the June 30, 2021 board meeting materials. The FSP was also updated at the 2021-22 first interim reporting period and included in the budget narrative provided with the December 15, 2021 board meeting materials. The FSP projects a remaining deficit of \$1.2 million in 2023-24 after the planned actions are implemented.
4. The county administrator approved the 2021-22 Budget Development Calendar at the February 17, 2021 board meeting. The calendar included due dates for completing numerous actions related to budget development, but it did not include the department and/or position responsible for completing each task. The calendar did not include some of the key tasks for budget development such as the date for completion of staffing projections prior to March 15, the date that site administrators and department managers are to receive budget forms/worksheets, and the date that the completed forms/worksheets are to be submitted to the business office. At the time of FCMAT's fieldwork, the budget development calendar for 2022-23 had not yet been approved.
5. The Business Services Department revised the Budget Development Process for School Sites and Department manual that provided some information to administrators about budget development. It included information regarding projected school site enrollment; employee position types; and preliminary general fund, supplemental and concentration grant, and Title I site allocations. The business office also provided school sites with budget development worksheets, which included instructions for completion, site allocations by resource, actual expenditures to date, a position control site staff list and a chart of accounts. Documents indicated that the budget development manual and budget allocations were reviewed with principals and that the budget worksheets were to be completed and returned to the business office. Documents provided to FCMAT for 2021-22 budget development also included various spreadsheets with projections for enrollment and ADA, LCFF funding, and SELPA allocations. No information was provided regarding staffing formulas and projections, or forms/worksheets used to develop department budgets.
6. In previous review periods, the district experienced significant year-over-year carryovers of Title I funding, which required a waiver to be filed for excess carryover beyond the 15% allowance. Providing carryover funds late in the school year, either at the districtwide or school site level, puts the district at risk of exceeding the maximum carryover amount allowed by restricted funding sources. The Budget Development Process for School Sites and Department manual states that Title I allocations include projected carryover funds, and district documents show that Title I site budgets were adjusted in October 2021 based on enrollment and prior year carryover.

## **Recommendations for Recovery**

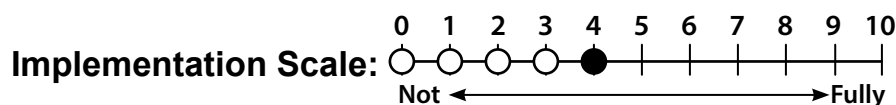
1. The district should develop and document a process that provides for all components of the LCAP to be included in budget development and include a summary of the LCAP expenditures in the budget narrative documents.



2. The district should continue to revise its FSP as needed and implement the plan to ensure fiscal solvency.
3. The district should ensure that site administrators and department managers are an integral part of budget development and continue to provide them with training on budget development and monitoring.
4. The district should continue to use standardized budget worksheets for school sites and develop and implement standardized budget worksheets to communicate department budget allocations. Each site/department budget manager should be required to complete the worksheets indicating the account codes where funds are to be budgeted and submit the completed forms to the business office.
5. The district should ensure the budget calendar includes deadlines for all budget tasks and the department and/or position assigned to complete each task. The calendar should be disseminated to all who are responsible for such tasks.
6. The district should include carryover in site and/or districtwide budgets before the first interim reporting period, but only after it has finished closing its books for the previous fiscal year. Site and department administrators should continue to be notified when carryover is provided and the amount for each resource.
7. The district should ensure that budgets are monitored throughout the year and that restricted resources do not exceed allowable carryover balances since this may necessitate the return of funds to the grantor.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	3
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 6.1 Budget Adoption, Reporting, and Audits

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### Legal Standard

The LEA adopts its annual budget within the statutory timelines established by EC 42103, which requires that on or before July 1, the board shall hold a public hearing on the budget to be adopted for the subsequent fiscal year. Not later than five days after that adoption or by July 1, whichever occurs first, the board shall file that budget with the county superintendent of schools. (EC 42127(a))

### Findings

1. EC 42127(a)(1) and 52062 require school districts to hold two separate public board meetings at least one day apart. The first meeting is for the LCAP and budget public hearings, and the second is for the LCAP and budget adoptions. The LCAP item must precede the budget item at each meeting (EC 42127(a)(2)(A)). The public hearings require 72 hours public notice, and both the LCAP and the budget must be adopted on or before July 1 each year.
2. The district made presentations regarding the proposed 2021-22 LCAP and the proposed 2021-22 budget at its June 23, 2021 board meeting. Later in the meeting, the district conducted public hearings seeking input on the proposed 2021-22 LCAP and the proposed 2021-22 budget. The minutes indicate that no public input was given during either hearing.
3. Per Education Code Section 52062(b)(2), the meeting for the public hearings and the meeting for the adoption of these documents are to take place at least one day apart to ensure there is an opportunity to incorporate revisions, if needed, in consideration of the input discussed during the public hearings. The June 30, 2021 meeting minutes indicate that the 2021-22 LCAP and the 2021-22 budget were adopted in the proper order.
4. The district prepared its 2021-22 proposed budget and LCAP, and Form CB of the budget documents indicated these documents were made available for public inspection at least three days prior to the board meeting scheduled for a public hearing as required by EC 42127(a)(1) and 52062(b)(1).
5. The county office's review letter dated September 15, 2021 approved the district's 2021-22 LCAP and budget. The letter noted that the district projected a surplus of \$11.6 million for 2021-22; however, it projected operating deficits of \$2 million in 2022-23 and \$4.7 million in 2023-24. The district was required to address deficit spending in the update to its FSP and submit it with its 2021-22 first interim report.
6. County office staff indicated that the district continues to meet the budget submission timelines as required by EC 42127(a).

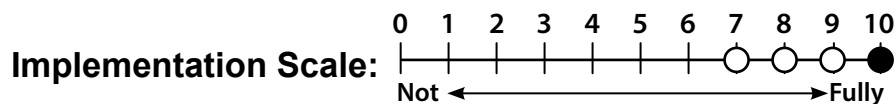


## Recommendations for Recovery

1. The district should continue to hold public hearings for its LCAP and proposed budget at least 24 hours prior to the board meeting to adopt the LCAP and budget, on or before July 1 of each year, in accordance with Education Code Section 52062, and ensure action on the LCAP precedes action on the proposed budget in accordance with Education Code Section 42127(a)(2)(A).
2. The district should continue to file its adopted budget with the county superintendent of schools within five days of its adoption or by July 1, whichever occurs first.

## Standard Fully Implemented

July 2013 Rating:	7
July 2014 Rating:	8
July 2015 Rating:	7
July 2016 Rating:	7
July 2017 Rating:	8
July 2018 Rating:	9
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 6.2 Budget Adoption, Reporting, and Audits

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### Legal Standard

Revisions to expenditures based on the state budget are considered and adopted by the governing board. Not later than 45 days after the governor signs the annual Budget Act, the LEA shall make available for public review any revisions in revenues and expenditures that it has made to its budget to reflect funding available by that Budget Act. (EC 42127(h))

### Finding

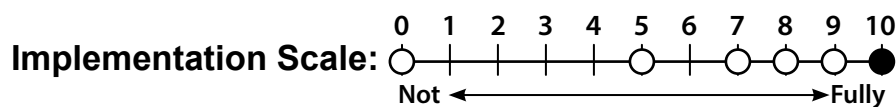
1. Governor Gavin Newsom signed the 2021-22 State Budget Act on June 28, 2021, which made minimal changes to the provisions outlined in the May revision on which the district's adopted budget was based. The county administrator approved revisions to the district's 2021-22 budget at the regular board meeting on August 11, 2021 in compliance with Education Code Section 42127(h).

### Recommendation for Recovery

1. The district should continue to follow the requirements of Education Code Section 42127(h) within 45 days of the governor signing the annual Budget Act.

### Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	5
July 2016 Rating:	7
July 2017 Rating:	8
July 2018 Rating:	9
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 6.3 Budget Adoption, Reporting, and Audits

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### Legal Standard

The LEA completes and files its interim budget reports within the statutory deadlines established by EC 42130, et. seq. All reports are in a format or on forms prescribed by the superintendent of public instruction and are based on standards and criteria for fiscal stability.

### Findings

1. During this review period the district filed the following interim reports:
  - 2020-21 second interim report, approved at a regular board meeting on March 10, 2021
  - 2021-22 first interim report, approved at a regular board meeting on December 15, 2021

Financial reports for each interim reporting period submitted to the county office during this review period were in the SACS format; and although not all conditions in the criteria and standards section were met, they included assessments of the district's fiscal stability for each of the criteria and standards measured by data in the SACS supplemental reports.

2. EC 42130 requires that the second interim report describe the district's financial and budget status for the period ending January 31 and be approved by the district's board within 45 days, or by March 17, 2021. Minutes of the district's March 10, 2021 board meeting indicated approval of the 2020-21 second interim report in compliance with the statutory deadline.
3. Because the district filed a positive certification for its 2020-21 second interim report, it was not required to submit an end of year financial statement, projecting its fund and cash balances through June 30, 2021, for the period ending April 30, 2021. This is commonly referred to as a third interim report.
4. EC 42130 requires that the first interim report describe the district's financial and budget status for the period ending October 31, and be approved by the district's board within 45 days, or by December 15, 2021. Minutes of the district's December 15, 2021 board meeting indicated approval of the first interim report in compliance with the statutory deadline.

The district's 2021-22 first interim report shows a projected unrestricted general fund surplus of \$10.7 million in 2021-22, a surplus of \$20,048 in 2022-23 and a deficit of \$1.2 million in 2023-24. The district's FSP submitted with its first interim report includes ongoing expenditure reductions of \$4.6 million in 2021-22, and additional expenditure reductions and revenue enhancements totaling \$4.9 million in 2022-23 and \$1.1 million in 2023-24. The district needs to follow through with expenditure reductions and/or revenue enhancements to eliminate the operating deficit and maintain the required reserve for economic uncertainties.



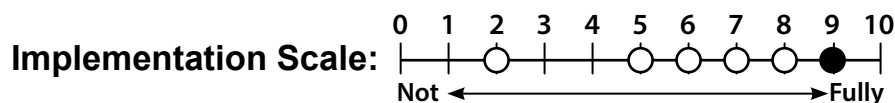
5. Inquiries with county office staff confirmed that the district submitted interim reports within the appropriate timelines. The county office's review letter for the district's 2020-21 second interim report was dated April 15, 2021, and the review letter for the 2021-22 first interim budget report was dated January 19, 2022. The county office's 2021-22 first interim review letter stated that the district should be able to meet its financial obligations for the current and subsequent two fiscal years with the implementation of its FSP. The county office concurred with the district's positive certification and noted that the district has made measurable progress towards fiscal stability and that it must continue to implement the cost savings and expenditure reductions identified in its FSP to sustain its fiscal stability.

## Recommendations for Recovery

1. The district should continue to ensure that all interim reports comply with the conditions and timelines established in EC 42130 et. seq.
2. The district should continue to ensure that all budget reports are approved by the county administrator/board and filed with the county office on time and include a plan to meet all financial criteria and standards for fiscal stability.

## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	5
July 2016 Rating:	5
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	9





## 7.2 Budget Monitoring

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### Professional Standard

The LEA implements budget monitoring controls, such as periodic budget reports, to alert department and site managers of the potential for over expenditure of budgeted amounts. Revenue and expenditures are forecast and verified monthly. The LEA ensures that appropriate expenditures are charged against programs within the spending limitations authorized by the board.

### Findings

1. Interviews indicated the district no longer uses the prior CBO's Access program budget reports format to send reports to the sites and departments. The district implemented FCMAT's recommendation and is using the budget reports available from the PeopleSoft financial system through the Reports and Data (RAD) portal. Interviews with business office staff indicated these budget reports are sent to individual school sites and departments monthly and/or on request. Some departments and site staff have been trained to access budget information directly through PeopleSoft and therefore do not have to rely on the Business Services Department to receive the reports.
2. Various business office staff meet with site/department personnel to review their budget reports, offer assistance with budget issues and provide training. Meetings include staff from the Educational Services Department to ensure sites use categorical funds correctly. FCMAT's review of some categorical program budgets found large remaining balances in Title I and Elementary and Secondary School Emergency Relief Fund (ESSER) II programs as of January 2022, which represents approximately 50% of the fiscal year. For example, 10 school sites and seven departments had unspent funds equal to 75% or more of their Title I allocation, and two school sites and six departments had unspent funds of over 75% of their ESSER II allocation. Although the ESSER II funds are not required to be fully spent until September 30, 2023, funds that are not spent in a timely manner or not according to the district's expenditure plan may need to be returned to the state. While some unused allocations were in the site's supplies and services accounts, some staffing allocations had 100% remaining as unspent. Typically, the remaining balances in salary accounts reflect the remaining months in the fiscal year (e.g., if 50% of the fiscal year is left, the remaining balances in salary accounts should be approximately 50%). The PeopleSoft budget reports include a column that shows the percentage of funds remaining in each account line, which makes it easy for sites and/or departments to know which accounts need to be spent down. Communication with school sites is critical to keep the site principals and clerical staff informed of their categorical programs and discretionary allocations and to hold the sites accountable for monitoring their budgets.
3. The district uses the PeopleSoft financial system for centralized budgeting and purchase requisition processing. Purchase requisitions follow an established process starting at the department or site level for authorization, followed by approvals with the cabinet-level administrator and/or categorical programs administrator, if necessary, to ensure program compliance with state and/or federal grants. Additionally, if sites or departments purchase technology equipment, the purchase requisition is routed to the executive director of IT for approval.



The business office fiscal services/budget analyst reviews purchase requisitions under \$10,000 for budget availability before the requisition is forwarded to purchasing for further processing. Although a hard stop is preferable for processing purchase requisitions, the district uses a soft stop, which allows business office staff to override warnings when the account line has insufficient funds. Budget availability is determined for the overall site or department budget, not at the object code level; therefore, some object codes can have large negative balances and others positive balances. Large budget transfers are prepared by the CBO at interim reporting periods at the major object code level on a districtwide basis.

4. The district has created a Budget Transfer Request Form that is initiated through the Informed K12 system. According to the budget transfer procedures, this form was created to address issues with purchase requisitions that would otherwise not have been processed or would have been delayed due to insufficient funds. The form is initiated by sites and departments, followed by approvals of the cabinet-level administrator and/or categorical program administrator. Interviews indicated, however, that the business office does not enter each budget transfer request as it is submitted but instead processes large budget transfers at interim reporting periods unless there is a significant or major change to a specific program. FCMAT's review of the district's budget report found that since the business office does not process the budget transfer requests regularly, various account lines still had negative balances.

FCMAT continues to recommend that the district implement the online processing feature that stops users from encumbering a purchase requisition if sufficient funds are not available within a budget account code. Implementing this feature would provide adequate controls, ensure funds were not overspent, and save staff time that is devoted to constant review of budget availability. In addition, sites will know how much funding is available at any given time. While this involves training for site and department personnel, the overall benefit of the process will be to provide up-to-date information for managers to monitor budget and availability of funds and prevent duplication of work by the sites/departments that maintain Excel spreadsheets to track their budgets.

5. In the PeopleSoft financial system, purchase requisitions do not post to the encumbrance ledger, reducing the remaining budget balance, until the purchase order has been approved for processing at the district office level. As reported in several previous FCMAT reviews, the time lapse between initiation of a purchase requisition and district level review and processing can take several days. Therefore, depending on how long it takes to review budget availability and generate purchase orders, the inability to immediately encumber purchase requisitions can cause budgets to be overspent.
6. FCMAT continues to recommend that business office staff be evaluated to ensure staff have the necessary skills and ongoing training to perform essential functions. The district has implemented best practices for some critical functions that include basic budgeting practices, but has still not implemented proper budget monitoring or proper alignment of budget to actual expenditures. The result continues to reflect an unrealistic budget that has millions of dollars of overstatements and understatements in major object codes and poor internal control features at the site and district level.



7. While the Business Services Department prepares and posts some budget transfers at interim reporting periods for all school sites and departments, the transfer information provided to FCMAT did not include supporting documentation. The table below includes examples of the budget to actuals at the 2021-22 first interim that indicated budget monitoring and/or the appropriate level of budget transfer and/or budget analysis activity has not occurred.

Description	Object	Original Budget	Projected Budget at First Interim	Actuals to Date at First Interim	Notes
Fund 01 Unrestricted General Fund					
State Aid-Prior Years	8019	\$0	\$0	\$723,541	Understated at First Interim
Special Education Entitlement	8181	\$2,225,965	\$2,396,655	\$2,613,984	Understated at First Interim
Career and Technical Education	8290	\$0	\$0	\$190,741	Understated at First Interim
Certificated Salaries	1xxx	\$45,047,328	\$44,470,751	\$10,176,063	Needs analysis, may be overstated
Classified Salaries	2xxx	\$21,203,012	\$21,752,914	\$3,278,746	Needs analysis, may be overstated
Employee Benefits	3xxx	\$31,546,545	\$30,095,215	\$4,888,929	Needs analysis, may be overstated
Approved Textbooks and Core Curricula Materials	4100	\$1,000,000	\$1,000,000	\$0	Needs analysis, may be overstated
Books and Other Reference Materials	4200	\$51,218	\$52,578	\$0	Needs analysis, may be overstated
Materials and Supplies	4300	\$4,648,955	\$6,713,409	\$1,229,532	Needs analysis, may be overstated
Noncapitalized Equipment	4400	\$5,023,624	\$8,109,415	\$157,947	Needs analysis, may be overstated
Travel and Conferences	5200	\$620,026	\$821,384	\$56,995	Needs analysis, may be overstated
Professional/Consulting Services	5800	\$26,984,499	\$45,616,997	\$5,043,458	Needs analysis, may be overstated
Buildings and Improvements of Buildings	6200	\$3,000,000	\$3,000,000	\$0	Needs analysis, may be overstated
Tuition, Excess Costs	7141	\$2,400,000	\$2,400,000	(\$143,581)	Needs analysis, may be overstated

FCMAT's review of the district's 2020-21 unaudited actuals, as part of its final obligation under AB 1840, found that the district had an increase of slightly less than \$19 million in the unrestricted fund balance and an increase of \$10.6 million in the restricted fund balance. The increase to the unrestricted fund balance was approximately \$2.7 million more than what was estimated on the district's estimated actuals report approved in June 2021. Most of the unanticipated increase can be attributed to reduced special education expenses in response to the pandemic, which reflects a reduced number of support services, behavioral aides and contracted services typically provided to these students in the traditional classroom setting. Additionally, due to the pandemic and virtual school setting, the district did not have to contract with outside vendors for transportation services and provided very little transportation with in-house staff. This resulted in a decrease of approximately 26% in special education transportation expenses, which also contributed to the reduction in the overall contributions from the unrestricted general fund for special educational services.

8. As stated in the AB 1840 letter dated March 1, 2021, FCMAT adjusted the district's projected salaries and benefits as they appeared to be overbudgeted. The table below shows the salaries and benefits for each of the various financial reports as they compare to the final unaudited actuals. This data shows that the district's salaries and benefits were



overstated by more than 3% for both unrestricted and restricted expenditures at first interim as compared to the unaudited actuals. Those variances decreased throughout the year as actual expenditure information became known, and the district's estimated actuals, which were submitted with the district's 2021-22 adopted budget, were only slightly underbudget. It appears that the work done during the estimated actuals review of employees' salaries and benefits should be completed with the same thoroughness at each of the interim financial reporting periods.

<i>Fiscal Year 2020-2021</i>										
Reporting Period	Adopted Budget		First Interim		Second Interim		Estimated Actuals		Unaudited Actuals	
EXPENDITURES	Unrestricted	Restricted	Unrestricted	Restricted	Unrestricted	Restricted	Unrestricted	Restricted	Unrestricted	Restricted
Certificated Salaries	27,139,030	11,890,069	28,193,430	12,159,062	28,004,261	11,754,807	27,285,827	11,462,005	26,954,252	11,107,888
Classified Salaries	9,162,770	5,584,634	9,087,746	6,031,638	8,717,759	5,904,084	7,762,585	5,820,448	7,405,018	6,121,038
Employee Benefits	15,267,247	6,923,837	15,716,078	7,215,200	15,487,551	7,217,947	15,803,189	7,101,819	16,669,389	7,316,300
TOTAL EXPENDITURES:	\$51,569,047	\$24,398,540	\$52,997,254	\$25,405,901	\$52,209,570	\$24,876,837	\$50,851,601	\$24,384,272	\$51,028,660	\$24,545,226
Variances:										
Vs. Unaudited Actuals	-1.05%	0.60%	-3.71%	-3.39%	-2.26%	-1.33%	0.35%	0.66%		

Upon review of the district's 2020-21 unaudited actuals, FCMAT found that the district has not reconciled and cleared its balance sheet accounts, which was one of the same issues raised in FCMAT's review of the district's prior two years' unaudited actuals. Unreconciled balance sheet and general ledger accounts, especially over multiple years, are an internal control weakness, which can have an adverse consequence to the district's operating budget, cash and net position. District leadership should make reconciliation a priority in the current year. Interviews indicated that staff members are researching these issues and hope to have these accounts cleared by this year's unaudited actuals.

As further discussed in Standard 8.2 and 10.4, the district does not routinely reconcile and clear its balance sheet accounts and fund 76, which can lead to material misstatements of its fund balance.

9. The district continues to make extremely large unrestricted general fund contributions to support special education program costs including transportation. According to the 2021-22 first interim report, the contribution to special education is projected to be \$25.5 million, or 69.86% of the total special education expenditures. The 2020-21 unaudited actuals SEMA report shows a contribution of \$22.8 million, or 76.73% of the total special education expenditures.
10. Interviews with staff confirmed that budgeted expenditures and vendor invoice tracking for special education costs, including nonpublic school agencies NPA/NPS, lack thorough management review. FCMAT has continued to identify the need for internal controls and procedures to properly project expenditures and special education cost containment measures, and the need for additional oversight for all special education program expenditures. (Additional information is provided in Standard 20.1.)

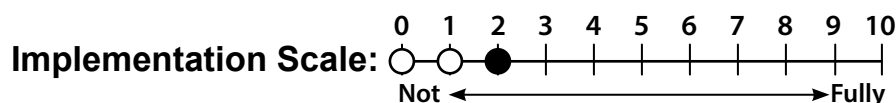


## Recommendations for Recovery

1. When the new countywide financial software system is installed, the district should consider implementing controls, if available, in the purchasing system so that funds are encumbered at the requisition level, and the purchase cannot proceed without sufficient funds.
2. The district should continue the implementation of the site/department budget transfer process and initiate a hard-stop control at the account code level in the purchasing process.
3. Budget transfers should have sufficient supporting documentation, and the site or department should initiate them before submitting the purchase requisition for business office approval.
4. The district should continue to send budget reports to site and department administrators at least monthly and encourage administrators and managers to use the online capability in PeopleSoft to review their site and/or department budgets.
5. The district should ensure that the budget is routinely monitored and properly aligned with projected revenues and expenditures.
6. The district should review and reconcile balance sheet accounts and fund 76 monthly.
7. The district should evaluate business office staff to ensure staff have the necessary skills, are properly trained and held accountable to perform essential functions.
8. The Business Services Department and special education management should review encumbrances for NPA/NPS services at least quarterly and adjust the encumbrances as needed.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	1
July 2017 Rating:	0
July 2018 Rating:	1
July 2019 Rating:	1
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	2





## 7.3 Budget Monitoring

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### Professional Standard

The LEA uses an effective position control system that tracks personnel allocations and expenditures. The position control system establishes checks and balances between personnel decisions and budgeted appropriations.

### Findings

1. The district uses PeopleSoft as its accounting and financial reporting software provided by LACOE. The district uses the HRS, a personnel, payroll and retirement system that is separate from, but integrates with PeopleSoft. The position control module is located within HRS as a separate database. The district fully implemented the position control module several years ago.

The position control system provides a link between HRS, payroll and budget; therefore, effective procedures and management oversight are essential elements to ensure that information is updated and revised regularly, and that defined roles between the HR and Business Services departments are established to ensure separation of duties and continual maintenance of changes in personnel and positions. Used properly, position control is a valuable tool. Historically, the district has experienced turnover in critical positions within the Business Services and HR departments, both of which have a critical role in the maintenance of the position control process (software). Stability in staff responsible for maintaining position control since FCMAT's last review has significantly improved the process.

2. As recommended in previous reviews, each position should ideally be stored in the database using a unique position control number. When the district implemented position control, groups of like-kind employees with similar funding sources at each site were established using one position control number. Using the position control system this way prevents those responsible for position control and human resource management from knowing how many vacancies exist within each position control number, how many employees hold unique credentials and certifications, and other necessary data for budgeting, hiring and decision-making. In addition, having a unique position control number for each position is especially useful as the district downsizes staffing due to declining enrollment.
3. The business office staff prepared a reconciliation of the 2021-22 first interim budget compared with a detailed position control report including actual payroll to date and projections for the remaining months. FCMAT's review of the reconciliation found some monthly salary amounts did not align with actual payroll for the first few months of the year. Interviews indicated that the position control system was not working properly and required the Business Services and HR department staff to audit the data position by position. At the completion of this review the staff provided each principal with an employee roster requesting them to review it and notate any errors or inconsistencies.



4. Interviews indicated that district staff recognizes it cannot monitor the budget properly if the position control database is not accurate. The district has worked continually to implement processes and procedures and ensure both Business Services, including Payroll, and HR departments' staff have been trained correctly on position control. Interviews indicated that the departments meet monthly to review and reconcile positions within position control, but the actual payroll and position control are still not reconciled. The district will need to ensure that the work done so far between the two departments is not lost in case of staff turnover from either department.
5. The position control system should include amounts for items such as overtime, extra-duty pay, stipends, substitutes, vacation payouts and estimated column movements; all payroll related costs should be included in the system because it ultimately populates the district's budget. The district uses multiple position control numbers for these activities instead of lump sums. To reduce redundancy, the district should combine like-kind items such as overtime that are included in several different account codes. This will reduce the volume of work for HR and Business Services department staff to manage these additional compensations.

Additionally, the way that the district accounts for overtime, extra-duty pay, stipends and substitutes show these types of positions as vacant in the position control system. This method is not conducive to determining actual vacancies. The district should be able to run a report from the position control system at any given time and produce a list of all vacant positions, which should ultimately match job openings posted by the HR Department.

6. While a district typically has vacancies throughout the fiscal year, forecasting the full costs of these positions is not a best practice because they generate payroll savings during the time of vacancy. Savings for unfilled positions should be recognized to provide a more realistic budget projection and financial position.
7. The district had a 13-step process for personnel requisitions. Using Informed K12, a digital workflow processing software, requests move electronically from the initiator through the approval process and ultimately are used to update position control. Leaders of the HR and Business Services departments recognized that this was a cumbersome process that needed to be reduced while maintaining proper checks and balances and has since implemented a revised nine-step process that has reduced the approval processing time as well. However, interviews indicated that the HR Department is still hiring personnel before the process has completed.
8. Interviews indicated that the business office provides the site principals with staffing reports monthly. However, school site principals indicated they receive the staffing reports only two to three times a year. Each administrator is to verify their list and report any errors, then the business office staff works with HR to process any necessary revisions in the position control system. During interviews, there seemed to be some confusion about which database is used to track this data. The HR Department uses a separate database than the Business Services Department, and it was unclear which report is provided to the sites. The sites should be receiving the staff reports from the position control system that are used for financial reporting so any errors can be corrected timely.



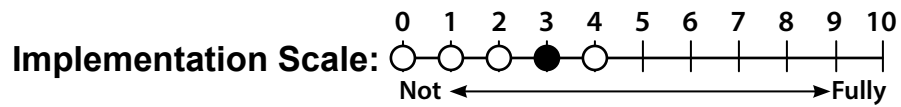
## Recommendations for Recovery

1. The district should provide unique position control numbers for each county administrator/board authorized position.
2. The district should consider using lump-sum amounts for certain additional compensation in the position control system instead of unique position control numbers.
3. To properly track vacant positions, the district should not account for additional compensation as vacancies in the position control system.
4. Defined roles between the HR and Business Services departments should continue to be established and implemented to ensure separation of duties and continual maintenance of changes in personnel and positions.
5. The district budget should include salary and benefit savings for positions that will not be filled in the current and/or future fiscal years to provide a more realistic financial position. When the county administrator/board eliminates positions, these should be immediately removed from position control projections.
6. The Business Services and HR departments should continue to review periodic reports in the position control system to ensure that additions and deletions have been completed and that total full-time equivalent positions, salaries and benefits fairly represent amounts populated in the budget less salary savings generated from open and vacant positions.
7. The district should compare the actual expenditures to date with the position control totals at each interim report period, and any major variances should be analyzed, and appropriate adjustments should be made to the budget.
8. All employees involved in the personnel requisition process should be provided with clear instructions on processing requisitions in a timely manner.
9. HR should not be allowed to hire until the personnel requisition has been fully approved.
10. The district should continue to send position control reports to site and department managers routinely (e.g., during budget development and at each interim reporting period) and ensure that data is reviewed and corrected as needed. The reports should include all the employees at each respective site or department.
11. The district should ensure that the position control reports sent to sites and departments are generated from the database that is used for financial reporting.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	3





## 8.1 Accounting

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### Professional Standard

The LEA forecasts its cash receipts and disbursements and verifies those projections monthly to adequately manage its cash. The LEA reconciles its cash to bank statements and reports from the county treasurer monthly.

### Findings

1. Eleven years of economic expansion ended abruptly in early 2020 when the COVID-19 pandemic triggered a recession, which resulted in the state implementing cash deferrals of principal apportionment payments to LEAs beginning with the June 2020 payment. Principal apportionment payments were also fully or partially deferred in the 2020-21 fiscal year, February through June 2021, and were not expected to be repaid until the next fiscal year, July through November 2021. On March 10, 2021, the district purchased \$15.5 million in State Aid Intercept Notes through the California School Finance Authority to assist with cash flow deficits caused by the state aid deferrals. The 2021-22 enacted state budget accelerated the repayment of deferrals so that all 2020-21 deferrals were repaid by August 2021. The district fully repaid the notes by August 2021 through an intercept of the deferral repayments.

In response to the COVID-19 pandemic, LEAs received significant one-time federal and state funds to address COVID-19 impacts on schools. These funding sources have various cash distribution schedules and expenditure deadlines that span several fiscal years. The receipt of these revenues in the 2020-21 and 2021-22 fiscal years, with expenditures occurring in subsequent fiscal years, has improved the district's cash position.

The state recovered more quickly than expected from the pandemic-induced recession, and the 2021-22 enacted state budget provided a compounded COLA of 5.07% on LCFF base grants and increased the concentration grant from 50% to 65%. In addition, per the provisions of SB 98 and SB 820, the district's 2021-22 LCFF revenues will be based on its 2019-20 ADA plus the 2019-20 ADA of two district-sponsored charter schools, which closed at the end of 2019-20. The additional ADA credited to the district will cease after 2021-22, and the district's 2022-23 funded ADA will reflect a two-year decline in enrollment and ADA, resulting in a substantial loss of revenue. One-time funding, such as this and the federal and state COVID-19 relief funds, can temporarily mask an ongoing operational deficit. The district must work to eliminate the structural deficit in its unrestricted general fund and maintain a positive cash position.

2. The district prepared cash flow projections at budget adoption and interim reporting periods that balance to the budget. The district's 2020-21 second interim report and 2021-22 adopted budget report included cash flow projections for both the 2020-21 and 2021-22 fiscal years. The district's 2021-22 first interim report included cash flow projections for both the 2021-22 and 2022-23 fiscal years. Monthly, the district updated its cash flow projections for actual activity and the CBO gave a cash flow presentation at board meetings. The CBO indicated that he regularly monitors cash balances.



The district's 2020-21 cash flow projections submitted with its 2020-21 second interim report and 2021-22 budget report do not fully or consistently account for revenue and expenditure accruals. For example, the cash flow projections do not fully account for the receipt of receivables and the payment of liabilities accrued at the close of the prior year. Additionally, the cash flow projections show revenue accruals only for LCFF sources. The projections assume that all other revenues and all expenditures are fully received and expended within the fiscal year. The 2020-21 cash flow projection submitted with the second interim report shows expenditures in services of \$14,509,246 in June 2021, or approximately 42% of the budget. The 2020-21 cash flow projection submitted with the 2021-22 adopted budget report shows expenditures in services of \$15,814,379 in June 2021, or approximately 44% of the budget.

The cash flow projection submitted with the district's 2021-22 first interim report appropriately accounts for the receipt and disbursement of prior year accruals. The projection also shows reasonable estimates of revenue and expenditure accruals at the end of the current projected year.

3. District staff reported and county office staff confirmed that the county office balances the cash in the financial system with the county treasury. FCMAT was not provided with copies of the cash in county treasury monthly reconciliations.
4. The district does not reconcile the cash with fiscal agent bank account to the district's financial records. The bank account balance on June 30, 2021 was \$16,649.52 while the balance on the financial report shows \$16,583.03.
5. Cash receipts deposited into the district's clearing account totaling \$113,903.70 as of October 2021 were not transferred to the district's accounts at the county office until November 30, 2021. Cash receipts totaling \$96,723.64 for November 2021 were transferred to the county on December 21, 2021. The district should make transfers of monies held in the clearing account into the proper fund on a timely basis, preferably weekly instead of monthly as is the current practice.
6. The district provided sample clearing account reconciliations for October, November, and December 2021. The October reconciliation was dated November 18, 2021, the November reconciliation was dated December 14, 2021, and the December reconciliation was dated January 12, 2022. Revolving fund reconciliations for October, November, and December 2021 are dated November 16, 2021, December 14, 2021 and January 14, 2022, respectively. Bank statement reconciliations should be completed within two weeks of the receipt of the statement, and based on the sample received, the district is completing the reconciliations timely. The documents demonstrate the reconciliation of the general clearing and revolving cash fund accounts and include the name or signature of the individuals that prepared, reviewed and approved the reconciliations.
7. The revolving account reconciliations show outstanding checks issued from the account dating back to July 30, 2018 were cleared from the account in November 2021. Stale-dated checks more than six months old should be cancelled and cleared monthly from the outstanding check list.
8. The revolving account has an approved balance of \$100,000. The reconciled balance in the account on January 31, 2022 was \$66,923. Most of the transactions in the district's



revolving account are for salary advances or payroll errors. The outstanding balance on January 31, 2022 that was owed to the district by employees, former employees, and board members dating back to February 2012 was \$30,577. An additional \$2,500 in nonpayroll disbursements from December 2021 had not been reimbursed as of January 31, 2022. The district collected \$5,956.11 during the current review period for some salary advances dating back to June 2016. There are no outstanding salary advances issued between June 2020 through December 2021.

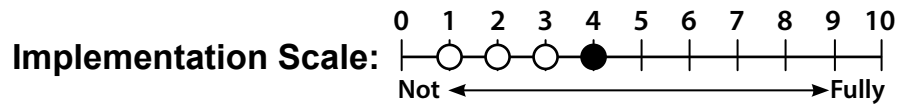
## **Recommendations for Recovery**

1. The district must work to eliminate the structural deficit in its unrestricted general fund and maintain a positive cash position.
2. The district should continue to verify its cash projections monthly and update them for the current and subsequent fiscal year as needed between budget and interim reporting periods.
3. The district should continue to accurately account for revenue and expenditure accruals in the receipts and disbursements sections of the cash flow projection and should continue to account for the receipt of revenues and the disbursement of payables for prior year accruals in the balance sheet section of the cash flow projection.
4. The district should make transfers of monies held in the clearing account into the proper fund on a timely basis, preferably weekly.
5. The district should reconcile the cash with fiscal agent account at least annually and ensure that the activity in the account is recorded in the financial records.
6. The district should continue to reconcile the revolving and clearing accounts monthly. Reconciliations should be completed shortly after the bank statements are available.
7. The district should cancel and clear any stale-dated checks over six months old from its bank reconciliation monthly and remove them from the outstanding check list.
8. The district should follow up on all outstanding items shown on the revolving fund bank reconciliations, including outstanding advances to former board members and overpayments to employees. All attempts to contact people for repayment should be documented.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	3
July 2017 Rating:	2
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 8.2 Accounting

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### Professional Standard

The LEA's payroll procedures comply with the requirements established by the county office of education, unless the LEA is fiscally independent. (EC 42646) Per standard accounting practice, the LEA implements procedures to ensure timely and accurate payroll processing.

### Findings

1. As of the date of fieldwork, the Payroll Department was fully staffed, with one payroll supervisor, hired in April 2021, and two lead payroll technicians, one hired in July 2021.
2. On October 9, 2019, the district approved a contract with a consultant to provide services for payroll operations from October 10, 2019 through June 30, 2020. On June 30, 2020, the county administrator/board approved a renewal contract for July 1, 2020 through June 30, 2021. On August 11, 2021 the county administrator/board approved an amendment of the contract to extend the term of the agreement through June 30, 2022. The consultant has been working with the new payroll supervisor to train her on making payroll tax deposits and completing quarterly payroll tax reports.
3. Personnel requisitions are created and routed electronically for approval using the Informed K12 system, a digital workflow processing software. During this review period, the district implemented a new personnel requisition workflow in Informed K12 reducing approval steps from 13 to nine. Interviews indicated that the new workflow process is quicker, resulting in fewer missed payments. After approvals have been obtained, HR staff enters the information into the HRS system. Staff reported there are still some processing delays when positions are not set up in the HRS system prior to the payroll deadline, causing manual payroll advances. Documents provided show that the number of handwritten checks for missed payments have decreased from the prior review period and varied from zero in some months up to seven in one month.
4. The district uses the Frontline software system for absence reporting and substitute placement. Employees are expected to use the system to report their absences; however, in some cases, employees call or email the office managers to enter the employee's absence in the system. School sites use sign-in sheets to record employee attendance and use the Frontline reports along with the sign-in sheets to create absence reports in Informed K12. The absence reports are routed electronically to the site administrator for approval and then to payroll. The lead payroll technicians manually transfer the employee absence information from the absence reports to a shared spreadsheet to record employee absences and track leave balances. Payroll meets with HR twice a month to review the leave balances and ensure that payroll docks are entered correctly. The payroll supervisor indicated that she audits the technicians' entries on the spreadsheet by reviewing a sample of the absence reports and checking them against the entries on the spreadsheets. The district provided FCMAT with copies of several monthly absence report reconciliation forms. The forms were signed by both the lead payroll technician and the payroll supervisor.



5. As mentioned above, school sites use sign-in sheets to record employee attendance and total hours worked. School site office managers transfer the hours/days worked from the sign-in sheets and the Frontline reports to create timesheets. Timesheets are created and routed for approval using Informed K12. The site principal approves the timesheets, which are then routed to HR for approval, and then to Payroll. This electronic system allows staff to track the form throughout the approval process. Staff reported that some timesheets are not submitted by the payroll deadline for processing, causing manual payroll advances. Some departments still use a manual paper process for timesheets, and interviews indicated that one department uses a signature stamp. The use of a signature stamp should not be permitted, as use of a stamp does not ensure that the supervisor reviewed and approved the hours worked.

The lead payroll technician compares the timesheets to the position and rate information in HRS. In addition, the technician prints the certificated and classified personnel rosters that are presented on the board agenda each month to check for approval of personnel items. During this review period, the district implemented the use of a spreadsheet, which is maintained on the shared drive. The purpose of the spreadsheet is to minimize the number of manual paychecks when employee changes are not entered timely in the system. HR staff enter payroll changes on the spreadsheet and payroll staff check it for changes before processing payroll to ensure the most updated information is included.

Staff interviews indicated that the district plans to implement the time and attendance feature of the Frontline software system, which will allow for electronic timekeeping and eliminate the need for manual sign-in sheets. Processing timesheets is cumbersome, requiring many hours of manual processing and verification. To avoid manual processing and potential for errors, the district should follow through with the implementation of an electronic process.

6. Interviews with staff indicated that any overtime hours worked must have preapproval, and the preapproval form is routed through Informed K12. The preapproval form is attached to the timesheet and sent to payroll. However, staff reported that the process is not always followed, and payroll staff are sometimes directed to process overtime timesheets without the preapproval form. Management override of established processes represents a weakness in internal controls and undermines the authority of midlevel supervisors. Staff indicated that the amount of overtime paid has increased during this review period, and the payroll staff has seen some overtime timesheets with up to 130 hours of overtime in one month. Reportedly, some classified staff are allowed to take vacation time during periods when school is not in session, but then work during that time and submit timesheets for overtime pay.
7. Board Policy 3314-Payment For Goods And Services, states that “Newly budgeted positions shall be approved at a Board meeting prior to filling the position. Payroll for new employees hired in open positions shall be processed with ratification of the employment occurring at a regularly scheduled Board meeting.” The payroll procedures manual should be updated to reflect this policy, and the policy should be discussed with HR and Payroll staff to avoid confusion and ensure that it is implemented.



8. The district provided FCMAT with various HRS system procedure manuals used by staff to process payroll. The district is still working on developing a comprehensive Business Services Department procedure manual, and the payroll section has not yet been completed. The district provided FCMAT with some detailed instructions regarding some payroll processes.
9. The district has no written procedure on how to process payroll advances for missed documents or payroll errors. Based on interviews with staff and documents provided to FCMAT, employees may request a manual check if they do not receive a paycheck for their work on their scheduled payday; the district calls these manual payments “payroll advances.” The district’s agreement with its classified bargaining unit requires the district to issue a check for 70% of the gross salary amount if an employee’s regular monthly paycheck is not available on the scheduled payday.

In some cases, the Payroll Department calculates the hours to be paid from a timesheet or time report and writes a check from the revolving account for 70% of the gross amount to allow an estimated 30% for taxes. The amount advanced is repaid by a miscellaneous deduction from the employee’s next paycheck. In some cases, the district uses the financial system to calculate the exact amount of taxes, statutory benefits, voluntary deductions, or garnishments, if any, that should be withheld from the gross pay. The employee receives a revolving fund check for the calculated net pay, and the paycheck is processed payable to the employee and deposited into the district’s revolving fund account. The employee signs a form acknowledging that they received an advance for a specified amount and that they agree to reimburse the district for the advance or allow the Payroll Department to deposit the payroll warrant, once it is available, in the revolving account. There are no outstanding payroll advances from this review period on the district’s list of outstanding payroll advances. However, the risk of overpaying employees would be reduced if the district consistently entered a miscellaneous deduction on the employee’s next paycheck to reimburse the revolving fund.

10. FCMAT continues to recommend that the district adopt a board policy to address payroll overpayments and identify repayment methods. During this review period, FCMAT was not provided with documentation to substantiate that such a policy was created. The district’s agreement with its classified bargaining unit states that payroll overpayments will be collected by automatic salary deduction in equal installments over 12 months. Additionally, some general interdepartmental procedures have been developed to guide staff members with the issuance of payroll advances; however, the procedures do not include details regarding the collection of overpayments. A detailed list of overpayments is no longer maintained.
11. The letter used by the district to notify employees of a salary overpayment notes the amount of the overpayment, the amount to be deducted over the next number of months, and the date the deductions will begin. However, the letter is missing key elements including the date(s) of overpayment, the reason for the overpayment, an offer to meet with the employee and review the issue, a deadline to respond to the letter, and a place for the employee to sign and date their acknowledgement of the salary overpayment and repayment method. A best practice is to develop and implement a form letter to notify employees of an overpayment that clearly communicates all information pertinent to the matter.



12. In several previous reporting periods, FCMAT has recommended that the district establish administrative regulations to collect or write off payments due to the district if determined to be uncollectable. As discussed in Standard 8.1, a review of the revolving fund as of January 31, 2022 indicates \$30,577 in payroll overpayments were outstanding, some dating back to February 2012. Absent board policy and county administrator/board approval to write them off, these uncollected payments may represent a gift of public funds. The CBO indicated that the business office has worked to clear these old items, and documents show that \$5,956.11 has been collected since the last review period.
13. The payroll procedures manual provided to FCMAT during the last review period includes a procedure regarding the treatment of stale-dated payroll warrants. The procedure states that payroll warrants are classified as category two under GC 29802(a) and are stale if not cashed within six months of issuance. The procedure further states the district's policy is to hold the funds in the stale-dated warrants fund for four years after the warrants become void. During the four years, the Payroll Department will attempt to contact the employee or former employee to reissue the warrant. After the four years have lapsed, the Payroll Department will have LACOE transfer the money to the general fund. This process is to be performed every year. Amounts of less than \$15 will be transferred to the general fund yearly, per GC 50055. If an employee or former employee requests that a voided warrant more than four years old be reissued, the request must go to the board/county administrator for approval. FCMAT's review of eight stale-dated payroll checks dating back to July 2018 totaling \$1,231.05 were cleared in November 2021.
14. Payroll can modify withholding information on the payroll system; each lead payroll technician changes any applicable deductions related to their payroll, stamps the initiating document and files it. Employee-initiated modifications are not reconciled to computer-generated payroll withholding reports.
15. Internal controls for payroll should provide the appropriate checks and balances between departments and segregation of duties in the business office. Proper internal controls ensure that the employees who process payroll are not authorized to sign the payroll warrant list or have access to the pay warrants received from the county office. Payroll warrants are delivered from the county office to the Payroll Department, and each lead payroll technician sorts and prepares the checks they processed for mailing or delivery to employees. The district should assign a business office employee not involved in the processing of payroll to receive and distribute payroll warrants.
16. The payroll supervisor now audits or reconciles the payroll listing prior to submission of the payroll warrant list to the county office, and the CBO indicated that he checks cash balances before approving the payroll warrant register. The district should develop, implement, and memorialize the process with written procedures for reconciliation and review of the payroll prior to executing the final payroll warrant register. The district should designate another supervisor in the business office to perform this task when the payroll supervisor position is vacant. As a secondary review process, another manager in the Business Services Department should review the final payroll register before payroll is submitted to the county office.



17. In prior years, the district booked restatements to its financial statements of approximately \$15 million for unpaid payroll taxes. Interviews with staff indicated that fund 76, the payroll warrant pass-through fund, has not been reconciled in several years. Regular reconciliation of the payroll clearing accounts would identify payroll tax underpayments, payments could be made timely, and the district would avoid costly interest and penalty charges. During this reporting period, the district used a consultant to complete its first quarter tax returns and trained the new payroll supervisor to complete the second quarter returns. The payroll supervisor completed the third quarter tax returns. The payroll supervisor is now responsible for making sure payroll tax deposits are made timely and completing the quarterly payroll tax returns.
18. Payroll staff attend training events hosted by the county office of education and should continue to attend these trainings to learn how to pull various county system reports that may identify potential payroll errors. Training opportunities have been limited over the past two years due to COVID-19 restrictions, but one of the lead payroll technicians indicated she attended some trainings online. Additional training should be provided to the newly hired payroll technician.

## **Recommendations for Recovery**

1. The district should hire, train, and retain sufficient qualified staff in the Payroll Department to ensure payroll is processed accurately and in a timely manner, and proper segregation of duties and supervision occurs.
2. The district should ensure that personnel requisitions are initiated and electronically routed through the approval process and to payroll in an efficient and timely manner. HR staff should enter approved positions in the HRS system prior to the payroll deadline.
3. The district should enforce the use of the automated absence system by all employees at all sites.
4. The district should document the reconciliation process between the substitute-caller system, timesheets or payroll registers and its Excel spreadsheets to track absences for all employees, to ensure that the data entry is correct. All payroll-related transactions should be reconciled, and reconciliations should be reviewed and signed by a supervisor.
5. Supervisors should ensure that timesheets are submitted to payroll in a timely manner, on or before the payroll processing deadline to reduce the number of manual payroll checks. All sites and departments should use the Informed K12 system to create and route timesheets to payroll.
6. The district should eliminate the use of manual timesheets and require all sites and departments to use the electronic system.
7. The district should pursue implementation of electronic timekeeping software to avoid manual processing and potential for errors.



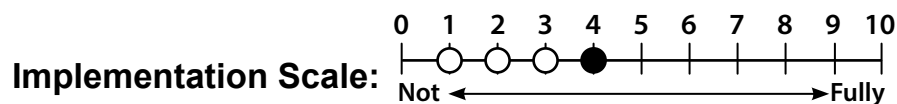
8. The district should ensure that it adheres to policy requiring preapproval for all overtime hours and management should not allow supervisors to circumvent the established procedures.
9. The district should prohibit the practice of allowing some employees to work during scheduled vacations, paying the employee for vacation and for overtime for the same hours.
10. Revisions to BP 3314 regarding approval of new positions and payment for employees in open positions should be provided to HR and Payroll staff to ensure understanding, and employees should be held accountable for following the policy. The payroll procedures manual should also be updated to reflect the revised policy.
11. The district should reestablish the practice of maintaining a detailed list of payroll overpayments, ensuring it is regularly updated.
12. The district should develop and implement a form letter to notify employees of an overpayment and clearly communicate all pertinent information.
13. The district should establish and implement administrative regulations and written procedures to seek the assistance of a collection agency to collect outstanding funds.
14. The district should adopt board policy addressing payroll overpayments to staff and the measures that will be taken to obtain repayment, and/or those for the county administrator/board to write off payments due to the district.
15. The district should review payroll procedures and implement additional internal controls, ensuring proper segregation of payroll duties, and ensure that payroll staff are monitored and supervised.
16. The district should develop and implement a payroll review process with written procedures for reconciliation and review of the payroll prior to executing the final payroll warrant register. A manager in the Business Services Department should review the final payroll register before payroll is submitted to the county office.
17. The business office should ensure that all payroll staff know how to generate payroll error reports within the financial system and are trained to use them.
18. A procedure to process payroll advances should be written with clear instructions of how to use the payroll system to generate the correct deductions from the gross manual payment to avoid overpaying employees. The procedure should address how to process the reimbursement of manual payroll checks by running the pay on the next county payroll cycle and entering a voluntary deduction payable to the Inglewood Unified School District for the amount of the manual check. To avoid overpayment, this process should generate a check for deposit back into the revolving account, and not another check to the employee.



19. The district should review overtime payments and add additional approvals if needed to eliminate any excessive overtime.
20. The district should prohibit the use of a signature stamp on timesheets.
21. The district should provide regular oversight of payroll tax processing to ensure that payroll tax reports are filed and payments are made accurately and timely.
22. The district should reconcile fund 76, the payroll warrant pass-through fund, and all payroll clearing accounts monthly.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 9.2 Attendance Accounting

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### Professional Standard

School sites maintain an accurate record of daily enrollment and attendance that is reconciled monthly. School sites maintain statewide student identifiers and reconcile data required for state and federal reporting.

### Findings

1. Student enrollment and attendance is the responsibility of the director of student support services under the leadership of the COO. The director of student support services position was vacant at the time of FCMAT's fieldwork. However, state attendance reporting remains assigned to the accounting specialist who reports to the senior executive director of fiscal services in the Business Services Department.

Several individuals are assigned responsibility for overseeing different student enrollment and attendance functions as follows:

- Principals: oversee school site office staff responsible for collecting new student registration data and documentation from parents when enrolling students and teachers who are responsible for daily attendance. Principals are also responsible for reviewing and certifying monthly attendance reports that are forwarded to the Business Services Department for state attendance reporting purposes.
- Elementary school sites are staffed with an office manager and a clerk/typist II. Secondary school sites are staffed with an office manager, a clerk/typist II, a registrar and an attendance clerk based on the size of the school.
- Clerk/typist II: at elementary school sites, this position is responsible for collecting student enrollment documents and entering and maintaining the new student data in the SIS. This position is also responsible for identifying and correcting errors and anomalies identified during the CALPADS state reporting process. For secondary school sites, these tasks are distributed between a clerk/typist II and the registrar.
- Teachers are all required to record attendance in the Aeries SIS daily. The clerk/typist II at elementary school sites and the attendance clerk at secondary school sites are responsible for monitoring teachers' daily attendance to ensure they are recording attendance each morning, modifying student attendance in the SIS for late arrivals and/or absence verifications, collecting certified attendance reports from teachers each week, and preparing monthly school site attendance reports.
- Principal of Inglewood High School and Inglewood Adult School: oversees the long-term independent study program with the support of one counselor position. However, during the current review cycle



this work is overseen by the COO due to changes in independent study practices resulting from the pandemic.

- Executive director of special education: oversees one data technician responsible for enrollment data in the SIS for students with IEPs and reconciling that data with the data in the SEIS. This data technician is also responsible for managing enrollment data for students attending NPS, which is based on information provided by NPS providers when invoices are submitted to the district for payment via the established email list.
- Director of student support services: responsible for overseeing school site attendance, alternative program attendance (i.e., short-term independent study and home hospital). This position is supported by a student support specialist responsible for overseeing the district's Student Attendance Review Team (SART) and Student Attendance Review Board (SARB) truancy programs and an ADA attendance clerk who monitors school site attendance and notifies school site administrators of any teachers not meeting the daily attendance requirements; prepares and sends first truancy letters for all school sites; and assists with enrollment and processing interdistrict applications.
- Executive director of IT: oversees a database administrator who is responsible for CALPADS reporting. The database administrator works with the data technicians, registrars, attendance clerks and/or clerk/typist IIs to reconcile data between multiple systems including the SIS (Aeries), child nutrition software (Nutrikids and eTriton), student testing systems, and teacher data in the position control and payroll systems and identify and oversee the correction of all errors or anomalies in student data identified through the CALPADS reporting process.
- Accounting specialist: responsible for state attendance reporting.

The district has made progress in establishing consistent practices for managing student enrollment and attendance across all school sites; however, weaknesses still exist for recognizing and entering student enrollment and daily attendance data in the SIS for students attending nonpublic schools. There were inconsistencies in what staff reported about how the district manages attendance for NPS students.

It is essential for attendance to be overseen by one individual knowledgeable of and/or experienced in all aspects of student enrollment and attendance requirements. The district has demonstrated improvement in ensuring student enrollment and attendance practices are consistent across all campuses. However, the district continues its struggle to ensure all elements contributing to state funding are fluid and accurate from the point of enrollment through state reporting. While some evidence indicates collaboration, the existence of isolated functions and the lack of reconciliation processes between all contributing segments remain.



2. The primary source of school district funding is state apportionment based on the LCFF. The LCFF calculations use ADA in the P-2 and annual certified attendance and unduplicated pupil enrollment certified in CALPADS. Accurate and timely enrollment and attendance accounting is essential to ensure the district receives its appropriate level of funding. Because school district funding levels are directly tied to student enrollment data, including elements related to the unduplicated pupil counts and ADA, the accuracy of the data reported to the state through CALPADS and attendance report submissions is extremely important.

The district has historically struggled to ensure that all data elements contributing to the unduplicated pupil count, including free and reduced priced meal eligibility and ELL designation, are collected and entered into the SIS timely.

3. Interviews indicate that while the district has improved some of its processes for identifying students attending and exiting nonpublic schools and ensuring they are enrolled or exited in the SIS, staff continue to note students listed on NPS invoices that are not enrolled in the SIS and vice-versa.

The Special Education Department is responsible for entering into the SIS all enrollment data for preschool special education students and all students attending nonpublic schools. Services with NPS providers are based on each student's IEP and/or 504 plan. Identification of or changes in NPS student status commonly occurs through data reconciliations between the SIS and the SEIS systems and through NPS provider invoices, which are submitted to the district by the service providers using a district established email distribution list. Student data in the SIS is reconciled against data in the SEIS to identify missing and/or inaccurate data in the SIS.

Attendance for NPS students is not entered into Aeries by any staff in the Special Education Department. The accounting office continues to use the ADA reported on the attendance registers that accompany the NPS provider invoices for state reporting purposes. These are often the same documents used by staff in the Special Education Department for new students attending NPS; as such, they come after the student has been receiving services. As a result, enrollment and attendance are not timely, may contribute to errors in CALPADS and attendance data submissions and could contribute to loss of LCFF funding.

A lack of communication remains between all departments responsible for different aspects of student enrollment and attendance, and there is no active administrative oversight that ensures cohesive enrollment and attendance processes through all segments.

4. Teachers must take attendance in compliance with the CCR, Title 5, Section 401, (a)–(d) which states:

(a) Elementary school attendance shall be kept in a state school register, as required by section 44809, except when a central file is maintained as authorized by Education Code section 44809.



(b) High school attendance (including junior high school) shall be kept on forms approved by the California Department of Education.

(c) In all high schools, except those listed in (d) of this section, each teacher shall be required to submit to the principal, at least once each school day, a report of attendance for each period of the day in which he conducts classes, listing the names of all pupils absent in any period.

(d) In all classes for adults, continuation schools, and classes, and regional occupational centers and programs, attendance shall be reported to the supervising administrator at least once each school month.

Attendance reports that identify the status of recording daily and/or period-by-period (if applicable) attendance should be consistently run each day. Principals should follow up when a teacher does not follow procedures and hold him or her accountable for accurate, timely attendance. Principals should aggressively enforce the established timeframe for teachers to record attendance each day. The Aeries system should be configured so that once this time period has passed, teachers are prevented from entering or modifying attendance for that day and must confirm attendance directly through the attendance clerk or front office staff so the principal is made aware of those who are not recording attendance timely.

Interviews with school site staff responsible for attendance indicated that teachers enter attendance into the Aeries Browser Interface daily. The clerk/typist II and attendance clerks verify that teachers enter attendance each day; for elementary school sites attendance is entered into the SIS by a set time each morning and attendance personnel run a verification report after that time to verify attendance has been taken. Middle school and high school attendance verifications are performed once at the end of each day for all periods. Parent/doctor notes for absences are forwarded to the school office.

The Student Support Services Department monitors daily attendance at all school sites. A daily attendance report is run and distributed to all school site and district administrators each day by the department's ADA attendance clerk. This continues to improve accountability for ensuring teachers are fulfilling their responsibility for following attendance procedures and principals are fulfilling their responsibility for monitoring daily attendance activities.

5. School site personnel reported that students who come to school late must report to the school office before going to class to ensure that attendance records are accurately updated. For secondary schools, school site attendance clerks revise attendance in the SIS as appropriate and provide the student with a slip to admit them to class. For elementary schools, staff in clerk/typist II positions are responsible for modifying attendance codes in the system based on parent and doctor notes submitted to verify absences and late arrivals.
6. Short-term substitute teachers do not have access to the Aeries system and are instead provided with manual attendance rosters for recording attendance. The manual registers are signed by the substitute teacher. Attendance documented by substitute teachers is recorded in the SIS by school office personnel.



7. The district has an established process for enrollment and attendance for students participating in the home hospital program. When a student is assigned to the home hospital program, he or she is designated as such in Aeries by the student's home school. The Student Support Services Department assigns the student to a home hospital teacher and prepares a manual attendance register for the home hospital teacher, who reports the days and hours instruction was provided to each student. Interviews indicated that the home hospital teachers submit signed weekly reports to the teacher of record, who then enters the attendance into the SIS. The accounting specialist uses the attendance recorded in the SIS for state attendance reporting purposes.
8. No changes have been made to the following described procedures for completing each reporting period (P-1, P-2 and annual), which include reconciliation and review of monthly reports generated by the school sites with the districtwide system reports before submission to the state. Teachers print and certify weekly attendance registers. Monthly classroom attendance certification reports are printed from the SIS at the end of each school month and are signed by the teachers and retained at the school sites. The school sites print monthly school site attendance reports, principals sign them, and copies are forwarded to the district office accounting specialist for state attendance reporting purposes. The accounting specialist enters the monthly attendance data for each school site and other programs into an Excel workbook, which then consolidates attendance for state attendance reporting for each reporting period. The district's 2020-21 audited financial statements contained no audit findings regarding attendance.
9. Interviews with staff indicated that school months are kept open all year in the SIS. The accounting specialist routinely reviews attendance from previous months to identify any changes made by school site staff after attendance has been submitted to the state. When changes are identified, all reports are rerun and recertified by the school site. A best practice is to close school months after certification of attendance is completed, so revisions to attendance data are controlled. Once an attendance month is locked, sites may view the information, but cannot change the data. The school site attendance clerk must identify any necessary changes and request the school month to be reopened so school site personnel can make corrections and recertify attendance for that period. Permissions can be established to allow access to those responsible for recording attendance earned through attendance recovery programs, as they are certifying that attendance. When corrections are necessary, all reports for the period should be rerun, recertified, and retained for an audit to ensure state-reported attendance is accurate, and supporting documentation accurately depicts certified data.
10. The IT Department, under the leadership of the executive director of IT, is responsible for managing and supporting the SIS, reconciling data between the SIS and other systems of original entry, and complying with CALPADS reporting requirements. The district has established processes for researching data elements reported in CALPADS and resolving errors and anomalies before data certification.

The IT Department has established reconciliation procedures for each of the multiple systems used to capture student data including Aeries, Nutrikids, eTriton, Test Operations Management System, and teacher data in the position control and payroll systems. Processes



to transfer data from some systems into the SIS for CALPADS reporting have also been established. For example, student data flows between Aeries, Nutrikids and eTritition through nightly imports, and data is transferred electronically from SEIS to Aeries.

During this review period, significant turnover and restructuring of positions within the IT Department took place. Staff members responsible for these duties had limited experience within the district's processes, so FCMAT was unable to evaluate further progress in this area. That said, there were no significant issues with the district's CALPADS reporting identified for the period under review.

11. Board policies, operational procedures, desk manuals and routine training for staff members with duties that involve enrollment and attendance tasks are all essential. The district has a comprehensive enrollment and attendance procedures manual and numerous detailed standard operating procedures (SOPs) containing detailed instructions relative to student enrollment and attendance procedures. The district should routinely review and update the manual and established procedures.

The IT Department continues to work with department and school site staff where necessary to ensure data collected in individual systems outside of the SIS is uploaded or otherwise entered into the SIS. Staff continue to rely on established procedures for recording data and training district and school site personnel. Sites continue to report similar practices in core daily enrollment and attendance activities, and the process for identifying CALPADS reporting errors. Interviews with staff responsible for entering student enrollment data into the SIS indicated that correcting coding errors and anomalies has become routine.

School site personnel acknowledge the existence of procedures for completing associated tasks; however, new school site personnel report that more extensive training would be appreciated since they have had to primarily rely on their peers to learn how to complete their work.

The enrollment and attendance procedures manual and standardized detailed instructions should be distributed and/or reviewed at the beginning of each school year with principals, assistant principals, school site clerical and support staff, attendance and IT support staff, and any applicable district office staff. These tools provide the schools with consistent reference sources to use in performing their duties and provide district office attendance staff and administrators with the guidelines to hold staff accountable for the proper recording and accounting of daily student attendance.

## **Recommendations for Recovery**

1. The district should continue efforts that ensure effective procedures for reconciling information between CALPADS and Aeries are established and followed.
2. The district should ensure routine reconciliations are performed between all segments contributing to student enrollment and attendance reported through CALPADS and state



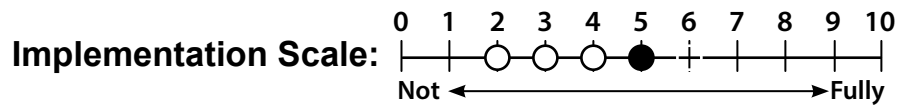
attendance reporting. One individual should be responsible for ensuring accuracy of all student data and attendance for and between all programs including home hospital, short-term and long-term independent study, nonpublic schools, Saturday school and general school attendance.

3. The Enrollment and Attendance Reference Guide should be reviewed at least annually and updated as needed.
4. The district should distribute the procedures manual and any other written procedures to all staff members responsible for student enrollment and attendance tasks, and an annual review of fundamental procedures and updates should be provided.
5. The district should continue monitoring daily attendance, holding all teachers and administrators accountable for the duties of completing accurate attendance records.
6. The district should require NPS providers to forward official attendance to the Special Education Department at the end of each week. The attendance reported on these registers should be entered in the Aeries SIS upon receipt. Attendance reported on invoices submitted by NPS providers should be compared to the attendance reported and recorded in the SIS.
7. The district should continue efforts in establishing standardized practices for managing enrollment and attendance for students attending nonpublic schools. The district should ensure that student enrollment is entered into the SIS in a timely manner and attendance is accurately reported to the state.
8. The district should routinely monitor standardized practices for managing enrollment and attendance for students attending all programs, ensuring that data is entered into the SIS accurately and in a timely manner.
9. The district should configure the SIS access schedule to limit the ability for entering and/or editing student attendance, ensuring that teacher access ceases after a predetermined time each school day and that school site attendance clerk access ceases upon certification and closure of each school month.
10. The district should ensure cross-training for CALPADS reporting procedures is adequate.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	5





## 9.3 Attendance Accounting

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### Professional Standard

Policies and regulations exist for independent study, charter school, home study, inter-/intra-LEA agreements, LEAs of choice, and ROC/P and adult education, and address fiscal impact.

### Findings

1. The district has established board policies and administrative regulations attributable to this standard including:
  - BP and AR 5116.1-Intradistrict Open Enrollment, revised February 20, 2019
  - BP and AR 5117-Interdistrict Attendance, revised April 22, 2020
  - BP and AR 5118-Open Enrollment Act Transfers, adopted August 4, 2014
  - BP and AR 6158-Independent Study, revised August 11, 2021
  - BP and AR 6181-Alternative Schools/Programs of Choice, adopted August 4, 2014
  - AR 6183-Home and Hospital Instruction, revised April 17, 2019
  - BP and AR 6200-Adult Education, revised February 20, 2019

Because the district established and follows a policy for open enrollment, which allows resident students to enroll in any regular, grade-appropriate Inglewood Unified school, it no longer uses intradistrict permits.

2. Board Policy and Administrative Regulation 6158 address independent study. The district continues to operate independent study programs offered to students upon request when absences are for three or more consecutive school days in accordance with EC 51747. Parents may request that their student be placed on independent study by completing an application and agreeing to the terms of the contract. Typically, the principal of Inglewood High School and Inglewood Adult School oversees the long-term independent study program, and the director of student support services oversees the short-term independent study program in concert with school site principals. As a result of the pandemic and changes in long-term independent study, the COO provided oversight of the program during the current review period.
3. State attendance regulations for independent study are stringent and require the school, parents, and teachers to follow each element of the agreement in a particular order. It is essential to ensure that both independent study programs comply with all program rules and regulations to avoid loss of apportionment funding. The district has adjusted its practices and oversight related to independent study during the period under review to ensure continued compliance with required elements of the independent study agreements, student work, and student attendance reporting practices.



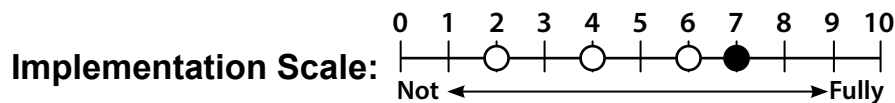
4. The district has established AR 6183-Home and Hospital Instruction, which offers individual instruction for students with a temporary disability that makes school attendance impossible or inadvisable. Parents must provide physician documentation supporting the illness or limitation. Students are matched with a teacher who works directly with the student's assigned teacher for coursework then goes to the student's home or hospital location to provide instruction.
5. The district does not have board policy or administrative regulations specific to charter school attendance. District-operated charter school attendance procedures are consistent with noncharter schools in the district; the charter school is simply set up in the SIS as another school site for recording student enrollment and attendance.

## Recommendation for Recovery

1. The business office should continue performing and expand periodic internal audits to test the validity of attendance reported for apportionment including independent study, home hospital and district-operated charter school programs.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7





## 9.4 Attendance Accounting

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### Professional Standard

Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.

### Findings

1. Student enrollment is initiated by parents either by submitting an online application or completing an application at the school with the assistance of school site personnel. Required documentation is either attached with the online application or brought to the school to complete the registration process. School site office staff use a standardized student enrollment checklist to complete the enrollment process, following up directly with parents to obtain any missing documentation. Each school site has a dedicated position, either a clerk/typist or registrar, who enters and manages student enrollment data in the SIS. Enrollment for students with special needs is initiated at the student's resident school where the required enrollment documents are collected, then the parent is directed to the Student Support Services Department for placement determination. Assigned personnel dedicated to special education reviews data for special education students and reconciles it against data in the SEIS system.
2. The district contracts with numerous NPS providers for services for some students with IEPs or 504 supplemental service plans. Staff members in the Special Education Department continue to work on improving processes to identify missing student information and data errors in Aeries and reconciling information between multiple special education systems not integrated with the SIS.

The district has established an email list, which it requires NPS providers to use to submit invoices. The special education budget technician, special education data technician and the accounting specialist all receive copies of the NPS invoices, which are used by each to complete various tasks including verifying students in SEIS and Aeries, verifying services provided against the IEP and capturing attendance.

While improvements have been made to district processes to mitigate issues, the district continues to struggle to ensure that the SIS data is updated in a timely manner for all students attending or exiting nonpublic schools. Interviews with staff continue to indicate that students noted on NPS provider invoices are not always found in Aeries when completing state attendance reports. As a result, student enrollment data, apportionment attendance, and unduplicated pupil counts all may contain errors.

### Recommendations for Recovery

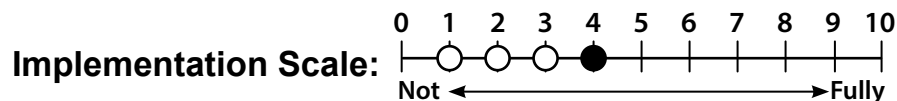
1. The district should monitor the implementation of established procedures that require student enrollment information to be entered into the SIS at the time of registration or as soon as possible following parent submission to ensure each student is recognized in the SIS and correctly assigned to a classroom so that daily attendance accounting is accurately reported.



2. Staff responsible for managing student data, including CALPADS reporting, should clearly understand how the student data is used throughout the district, including funding and student testing.
3. The district should continue improving procedures for obtaining, entering into the SIS, and reporting enrollment data for students attending NPS to ensure data is captured and entered into the SIS accurately and timely.
4. The district should monitor all enrollment and attendance tasks and ensure that data is properly captured for both enrollment for CALPADS reporting and attendance for state apportionment reporting.
5. The district should continue practices of routinely reconciling data in the SIS, SEIS, and CALPADS, including data for students enrolled in alternative programs such as NPS.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	1
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 9.6 Attendance Accounting

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### Professional Standard

The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.

### Findings

1. Under the direction of the COO, the director of student support services oversees district school site attendance and manages student services and programs including short-term independent study and home hospital. Programs related to student discipline, suspension and expulsion including the SART, District Attendance Recovery Team and SARB are also managed under the leadership of this position.
2. The district has established board policy and administrative regulations, many of which were last updated in February 2019. BP and AR 5113.1-Chronic Absence and Truancy, clearly define the responsibilities and methods for identifying and addressing chronic absenteeism. Administrative Regulation 5113.1 also states that habitual truants may be referred to a SARB, and BP/AR 5113.12 speak specifically to the SARB process. During the current review period, the district was reinstating all practices related to SARB; many of which had been suspended during the previous review period due to the COVID-19 pandemic and the implementation of remote learning.
3. The district continues to use School Messenger, an automated notification service integrated with the district's student information system that quickly delivers large volumes of messages through multiple channels for parent notifications, including notification of student absences. This allows for timely and efficient parent notification when a student absence is recorded.
4. The district's Student Support Services Department manages attendance intervention services. Progressive intervention for addressing chronic absenteeism is initiated by the ADA attendance clerk who is responsible for preparing the first truancy letters, which are sent to parents when a student has three or more unexcused absences. Copies of the letters are sent to the school site administrators who are responsible for mailing subsequent truancy letters to parents/guardians and proceeding with site-based intervention through the SART process if absences continue. School sites are responsible for monitoring student attendance and documenting intervention steps taken throughout the SART process and up until absenteeism reaches the point of a referral to SARB. Once a referral has been submitted, the Student Support Services Department personnel manage the SARB process.
5. BP 6176-Weekend/Saturday Classes, revised February 20, 2019, establishes the framework for the district to conduct makeup classes that include but are not limited to those for unexcused absences occurring during the week (Education Code 37223). The district has not yet resumed Saturday school program activities historically used as a strategy to recover apportionment ADA lost due to absenteeism. The program was temporarily discontinued in the 2018-19 school year, and due to the COVID-19 pandemic no plans have been set forth to reimplement the program.

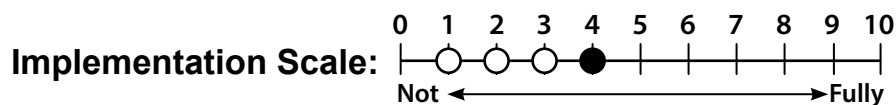


## Recommendations for Recovery

1. The district should monitor the implementation of established truancy processes and procedures performed by school site personnel.
2. The district should continue working with students, parents and the county district attorney's office to enforce attendance policies.
3. The district should continue monitoring practices followed at all school sites to ensure all SART/SARB procedures are consistently followed.
4. The district should evaluate strategies for resuming a Saturday school program for attendance recovery and implement a program.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	3
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	4





## 9.7 Attendance Accounting

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### Professional Standard

School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.

### Findings

1. Routine mandatory training is essential to ensure those responsible for recording and monitoring student attendance understand laws and regulations. Training provides an opportunity for those staff members to discuss information on the best practices, clarify procedures, and communicate with district office staff on areas that may need refinement or district intervention. An annual overview of the purpose and procedures for recording daily attendance ensures all staff members understand their roles and responsibilities in the attendance process and the importance of standardized procedures. An annual overview of the attendance software serves as a refresher to the system and allows the opportunity for questions and clarity.

Mandatory yearly training should occur before the start of each school year and should include attendance accounting procedures, compliance requirements, and internal controls. Training should be structured to target the different areas of responsibility including district attendance accounting, school site attendance and teacher daily attendance. Additionally, new staff members responsible for recording the official attendance should receive adequate training upon hire. A list of personnel required to attend should be used to document attendance, and accountability procedures should be established. Workshops such as those offered by the California Association of School Business Officials (CASBO) on pupil attendance accounting for school site personnel and school district personnel are great options for partially fulfilling the need for training.

The district conducted group trainings covering some student enrollment and attendance procedures for school site and department personnel. Interviews indicated that employees continue to have direct access to system tutorial tools to resolve their data entry problems. However, interviews also indicate that new school site personnel responsible for student enrollment and attendance do not feel they receive adequate training when assigned to their positions. Most reports indicate that a great deal of self-initiated collaboration takes place between these staff when confronted with work-related problems.

2. The district has moved away from monthly data management meetings with IT and school site staff historically used for group trainings. This practice has been replaced with individualized 1-on-1 meetings scheduled at the request of school site staff based on individualized needs for technical support about various enrollment data entry procedures, Aeries and CALPADS navigation tools used to identify and correct data entry errors, and duties assigned to data technicians and school site personnel with enrollment and attendance responsibilities. Interviews with staff responsible for entering



and managing student data in the SIS indicated that these meetings are helpful to those who take the initiative to request a meeting, but many site staff do not. Most school site personnel report self-initiated collaboration with colleagues in similar positions at other school sites.

3. The district has established written resource materials to support the daily duties of school site staff responsible for student enrollment and attendance. The district updated its comprehensive Enrollment and Attendance Reference Guide for the 2020-21 school year and distributed it to school site office staff and administration. The district also has a series of standard operating procedures referred to as “How To’s” located on its shared drive and accessible to all staff responsible for data entry and maintenance of student data in the SIS.
4. District administrators, including school site principals, should also receive annual training that ensures a clear understanding of the requirements regarding the school calendar, instructional days and required instructional minutes. All school site administrators should understand their responsibilities in ensuring that bell schedules, instructional days, and daily and annual instructional minutes comply with district policy and Education Code Section 46201. The district provided various trainings to site administrators and counselors during the period under review.
5. Interviews with school site personnel indicated collaboration between school office staff regarding student enrollment and attendance activities. However, all school office personnel should be cross-trained in enrollment and attendance procedures, so they can provide coverage when another employee is absent.

## **Recommendations for Recovery**

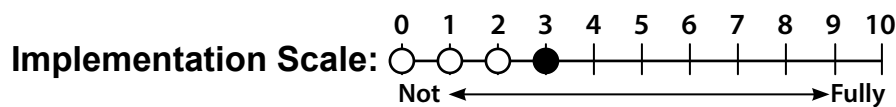
1. Training focused on student enrollment and attendance procedures, and Aeries attendance software should be required for all district-level staff members, school site staff, principals, teachers and IT Department staff with duties regarding student enrollment, attendance and/or CALPADS reporting. Training should be designed to ensure that proper procedures are followed consistently throughout the district, cover written attendance policies and procedures, and include any new laws and regulations on attendance and record-keeping requirements.
2. Mandatory training should be conducted for all school site and department personnel responsible for student enrollment and attendance before the start of each school year. Training should include an overview of all new attendance accounting procedures, and the importance of completing accurate attendance records for apportionment and auditing purposes should be stressed. Options including Pupil Attendance Accounting for School Site Personnel and Pupil Attendance Accounting for Business Office Personnel offered by CASBO should be considered by the district to assist in fulfilling this need. Those absent should be held accountable to obtain the required training.



3. The district should continue providing an annual overview of school site attendance procedures to school site administrators. Annual review should include any new changes in law or district established procedures as well as training on the school calendar, instructional days and required instructional minutes. The district should ensure that all school site administrators fully understand the calendar and bell schedules as established for each fiscal year to ensure that instructional days and minutes comply with district policy and state requirements.
4. The district should review, update, and distribute the comprehensive Enrollment and Attendance Reference Guide each year and provide a review of updates and revisions to school site staff.
5. The district should reestablish routine meetings and training for school site staff responsible for enrollment focused on student data and CALPADS reporting.
6. The district should ensure that all school office personnel are cross-trained in enrollment and attendance procedures.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	2
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	1
July 2018 Rating:	1
July 2019 Rating:	1
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	3





## 10.4 Accounting, Purchasing, and Warehousing

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### Professional Standard

The LEA timely and accurately records all financial activity for all programs. GAAP accounting work is properly supervised and reviewed to ensure that transactions are recorded timely and accurately, and allow the preparation of periodic financial statements. The accounting system has an appropriate level of controls to prevent and detect errors and irregularities.

### Findings

1. The administration has undergone many changes at the district level in the last several years. Since the last review period, the Business Services Department continued to experience staffing instability but was fully staffed at the time of fieldwork. The payroll supervisor was hired in April 2021, the director of fiscal services was hired in August 2021, and the procurement manager was hired in December 2021. Additionally, a lead payroll technician position and a senior accounts payable position were vacated and filled. Even with these shifts and changes, some controls still exist to help prevent and detect irregularities. These controls include the following:
  - The county office HRS position control system was implemented several years ago. The district has worked to implement processes and procedures and ensure both Business Services, including Payroll, and HR departments' staff have been trained on position control. The Business Services, HR, and Risk Management departments continue to have regular meetings to reconcile the data.
  - Budget reports are provided monthly to school site principals, and monthly meetings are held with principals to discuss budgets. Specific questions are discussed between business office staff and school sites at principals' meetings, or at the sites' request. School site principals indicated business office staff is available to assist when they have questions. Some sites track budgets and expenditures manually rather than using the financial system. Site administrators indicated they needed additional training on reading their budgets in the financial system. Department managers indicated they do not receive budget reports monthly, but only upon request.
  - Multiple approvals are required to process accounts payable transactions.
  - Journal entries require descriptions and backup, and a second-party review is part of the process.
  - A budget transfer form exists, and sites and departments can initiate budget transfers electronically using Informed K12. However, budget transfer requests are usually held and processed at the next interim reporting period.
  - The PeopleSoft accounting software prohibits the posting of unbalanced journal entries.



- Expenditures are reviewed to ensure sufficient funds (in total, by site or department) are available to cover current transactions; however, adequate controls are not in place to ensure individual accounts are not overspent.
  - Payroll procedures were designed to help prevent and detect unauthorized persons on the district's payroll as well as overpayments and underpayments (see Standard 8.2). The payroll supervisor audits or reconciles each payroll before processing by the county office.
  - At the district office, two people count cash receipts together; however, some sites reported that even though cash is counted by multiple people, sometimes they count it individually rather than together.
  - The receipt of goods and services is ensured before payment is processed.
  - The county office processes all warrants, and one of the dual signatures is required to be from that office. The CBO approves purchase requisitions and all warrants online and is the second signature on all warrants. The senior executive director of fiscal services is cross-trained in these duties.
  - Fully signed warrants that are scheduled for mailing are not left unattended.
  - The district has a substitute-caller system for all employees to contact when they are absent, reducing inappropriate payment when employees run out of available leave and providing better tracking of leave usage.
  - The accounts payable system is integrated with the purchase order system.
  - Interviews with staff indicated that employee accrued sick leave balances are included on payroll stubs.
  - There is an approved vendor list for withholding and payment of funds from pretax employee salary deductions for tax-sheltered plans and annuities.
  - Interviews with staff indicate that accounts payable staff do not have access to make changes in vendor screens, so they cannot add vendors or modify vendor information.
  - Interviews with staff indicate that payroll staff do not have access to add employees into the system.
2. The HRS system is not used to encumber payroll and benefits so sites cannot easily identify what portion of their budget is committed to payroll expenses. Most site principals reported that they are sent a list of certificated and/or classified staff assigned to their campus to review two or three times a year, but one reported receiving it monthly. If the list has an error, the change is reported and generally made in the HRS system by the HR Department.



The HRS system can encumber payroll, but under the present configuration, this would require completing and entering a purchase order for each employee with the appropriate account coding for salary and each of the statutory benefit classifications. At the end of each payroll cycle, the amount processed would need to be manually disencumbered. Because the probability of error from a manual system outweighs its benefits, the district cannot implement this internal control and budget monitoring mechanism with payroll.

3. The HR and Business Services departments now meet monthly to determine which positions are to be eliminated and which are true vacancies in the HRS system. However, there is no documented procedure to ensure eliminated positions are removed from the HRS system as they occur, and position control is not reconciled with actual payroll. Staff in the HR and Business Services departments need additional training in position control.
4. The accounts payable system is integrated with the purchase order system. However, the system allows for duplicate payments if individual invoice numbers are not entered in the system. Accounts payable staff indicated that they always enter invoice numbers, and they also keep a manual log to track invoices that have been paid on open purchase orders. Manually tracking purchase order payments is time-consuming, and the accounts payable staff should use the financial system to track payments.
5. There were no field trip expenses in the 2020-21 fiscal year because of school closures. Based on a review of the 2021-22 general ledger, two journal entries were made for field trip expenses, one on November 19, 2021 and one on December 7, 2021. FCMAT requested backup documentation for the November 19, 2021 entry and found that the transfer was made timely. However, most site budgets were overdrawn by these entries, and there were no budget transfers to correct the negative balances.
6. The district continues to experience insufficient segregation of duties for some tasks. The following areas are of concern, including some that are also audit findings:
  - Site custodians order necessary supplies from the warehouse; goods are delivered to the custodians, and the custodians sign for what was received. The same individual orders, receives and approves the custodial shipments, which is an insufficient segregation of duties and may provide opportunities for theft. This segregation of duties internal control is also missing with office managers in their order and receipt of office supplies.
  - Payroll and accounts payable warrants are returned to the same person who processed the transaction.
  - The district provided written procedures for the reconciliation of accounts receivable, but there was no evidence to demonstrate that outstanding balances were researched and reconciled. The 2020-21 audit report included a finding stating that approximately \$923,787 in beginning balances needed to be investigated and cleared.
  - The district provided written procedures for the reconciliation of accounts payable, but there was no evidence to demonstrate that outstanding balances were researched and reconciled. The district's 2020-21 audit report included a finding stating that \$2.3 million of accounts payable were



rolled over from prior years.

- A review of the 2020-21 general ledger report shows that other balance sheet accounts have not been reconciled and cleared by the district. Many balance sheet accounts have the same beginning and ending balances with no activity posted during the year. In addition, FCMAT observed some receivable accounts with credit balances and some payable accounts with debit balances. (The normal balance for receivables is a debit, and the normal balance for payables is a credit.)
  - Interviews with staff indicate that fund 76, the payroll warrant pass-through fund, has not been reconciled in several years. Regular reconciliation of the fund would ensure that the payroll transactions and corresponding payments match and would ensure that all activity recorded in the fund is appropriate (See Standard 8.2).
  - The district developed a time accounting manual, and an employee was assigned to collect time accounting documents. The district provided a sample of 38 semiannual certification forms. According to the position control report provided by the district, a few employees are multifunded, or paid from a mixture of federal and state or local sources. Employees that are multifunded must complete a monthly personnel activity report; however, the district did not provide any samples of monthly personnel activity reports. Not completing and collecting these documents timely for employees paid from federal funds can jeopardize current and future funding.
7. The district provided some written procedures for accounts payable, payroll, and purchasing functions, but not a complete, up-to-date business office procedure manual. Interviews indicated the senior executive director of fiscal services has been working to develop a Business Services Department manual with a section for each function. Many fiscal services staff started in their positions only a year or two ago and additional training is needed, most notably in position control, accounts receivable, general ledger maintenance, and fixed asset tracking.
8. Education Code Section 41020(h) requires the following:

Not later than December 15, a report of each local educational agency audit for the preceding fiscal year shall be filed with the county superintendent of schools of the county in which the local educational agency is located, the department, and the Controller.

Education Code Section 41020.3 states, “By January 31 of each year, the governing body of each local educational agency shall review, at a public meeting, the annual audit of the local educational agency for the prior year...”

AB 167, signed on September 23, 2021, extended the audit deadline for the 2020-21 fiscal year from December 15, 2021 to January 31, 2022. The district’s board meeting minutes indicate that the 2020-21 audit report was presented on January 26, 2022. The district complied with Education Code Section 41020(h) and 41020.3 for the 2020-21 audit.

9. External independent audit findings have continued to identify internal control weakness-



es as well as material weaknesses. Material weaknesses rise to a higher level of concern because they are significant deficiencies that result in a higher likelihood that the district's internal controls will not prevent or detect a material misstatement of financial statements. Several findings relate to lack of internal controls, and some are repeated in each of the last several years audited. However, the number of audit findings was reduced from 13 in 2019-20 to eight in 2020-21. The district did not provide FCMAT with a corrective action plan for audit exceptions, and there is no active audit committee. The auditor issued a qualified opinion on the 2020-21 audit report because the district's accounting records were inadequate and supporting documents were unavailable to support the amounts reported in the district's financial statements for capital assets and depreciation.

10. Interviews did not identify an individual in the Purchasing, Accounts Payable, HR, or Payroll departments who was assigned to track and report STRS retiree payments per STRS Employer Directives 2022-01 and 2022-03, or PERS retiree hours per CalPERS Circular Letter Number 200-002-14 for retirees hired as consultants. HR receives monthly reports from LACOE that track the hours of retirees and non-CalPERS employees paid through payroll when they exceed 800 hours. The HR Department then contacts the supervisor of the employee to alert him/her that the employee is approaching 960 hours. No evidence was provided to indicate that the district tracks STRS retiree payments.
11. AB 5 was signed into law by the governor in September 2019 and became effective January 1, 2020. The law requires employers to apply a three-part test, known as the ABC test, to determine whether a worker qualifies to be classified as an independent contractor rather than an employee. Misclassification can result in substantial liabilities for employment taxes and penalties, which must be paid by the employer. Interviews did not identify an individual in the HR or Business Services departments who was responsible for making the determination about whether a consultant qualified to be classified as an independent contractor. In the last review period, the district provided a workflow diagram of an independent contractor approval process; however, no documentation was provided to demonstrate that the process is used. FCMAT reviewed contracts, purchase orders, and payments made to several individuals paid as independent contractors and found no written determination of independent contractor status in the documents provided.

## **Recommendations for Recovery**

1. The district should hire, train and cross-train sufficient qualified staff in the HR and Business Services departments motivated to implement the internal controls identified in this report as well as in the most recent audit findings.
2. The district should meet with department managers monthly and continue to meet monthly with site managers and provide monthly budget reports to all managers responsible for site and department budgets. Business office staff should provide training on reading budget information in the financial system and on the proper coding of expenditures.
3. The district should continue to allow sites and departments to initiate budget transfers and should enter the transfers as soon as practical rather than waiting until the interim reporting period.



4. Journal entries and expenditure transfers should continue to include appropriate support documentation, be regularly completed, and be reviewed and approved by business office management. Field trip costs should be posted to site budgets in a timely manner.
5. Purchase requisitions should be reviewed for sufficient budget by account code, rather than by total site or department budget.
6. The district should consider configuring the position control system to encumber payroll once the installation of the new countywide financial software system is complete. The district should identify which documents drive the position control system, which positions are eliminated, and which are vacant in HRS, and eliminated positions should be regularly removed from the position control system. The procedure for the elimination of positions in the position control system should be documented. The total FTEs in the system should be reconciled monthly, and position control should be compared to actual payroll payments at least at each financial reporting period.
7. Procedures should be implemented at school sites to ensure that two people count cash together.
8. The district should continue to have sites review position control reports with employee names (both classified and certificated), position title, FTE, and account codes, preferably during budget development and at each interim budget reporting period. After sites reconcile the reports, errors should be reported to the HR Department, and the department should update the database.
9. The district should ensure that it implements controls in the accounts payable system to avoid duplicate payments if individual invoice numbers are not entered in the system. Accounts payable staff should continue to enter invoice numbers for each payment and consider discontinuing the time-consuming practice of tracking invoice payments manually for open purchase orders.
10. The district should ensure that the same individual, including those in the Purchasing Department, does not order, receive and approve the receipt of goods, including custodial and office supplies.
11. The district should continue to confirm the availability of sufficient cash balances before accounts payable batch processing.
12. All warrants should be returned to an identified Business Services Department or Food Services Department staff person other than the employee who processed the transaction.
13. Prior year accounts payable and accounts receivable balances should be reconciled by October 31 following the close of the fiscal year. Outstanding items should be researched and cleared in a timely manner. Any amount written off in the annual reconciliation process should be reviewed and approved by management staff.

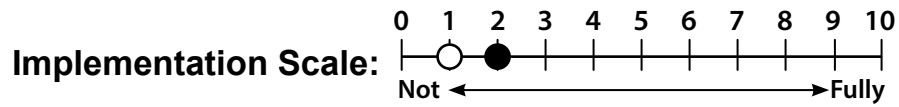


14. Controls should be implemented to ensure that expenses accrued as part of the prior year closing are not also charged as current year expenses, thereby overstating current year expense costs.
15. The business office should maintain logs and reconciliations to support all balance sheet items in all funds, including accounts payable, accounts receivable, cash on deposit with fiscal agent, revolving/petty cash and inventory. The district should reconcile fund 76, the payroll warrant pass-through fund, and all payroll clearing accounts monthly.
16. The district should follow reporting guidelines for timely federal time reporting for all employees who are paid from federally funded programs in compliance with Title 2, Code of Federal Regulations (2 CFR), Part 200.
17. A desk manual should be developed for each position in the Business Services Department, and the district should ensure that each employee includes in his or her desk manual step-by-step procedures for assigned duties.
18. The district should continue to work with its independent auditors to ensure that their work can be completed in time to comply with the December 15 and January 31 deadlines required by Education Code Sections 41020(h) and 41020.3.
19. Policies, procedures and internal control measures should be reviewed and revised to address audit findings. Procedures should be established to avoid repeating the same audit finding in future years.
20. The district should determine who is responsible for PERS and STRS reporting of retiree vendors/consultants, provide that person with appropriate training, and require service vendors/consultants to complete a form that properly identifies PERS and STRS retiree status.
21. The district should implement a process and assign responsibility for making the determination about whether a consultant should be classified as an employee or as an independent contractor. The results should be documented, and a copy should be kept with the contract/purchase order backup documents.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 10.5 Accounting, Purchasing, and Warehousing

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### Professional Standard

The LEA has adequate purchasing and warehousing procedures to ensure that: (1) only properly authorized purchases are made, (2) authorized purchases are made consistent with LEA policies and management direction, (3) inventories are safeguarded, and (4) purchases and inventories are timely and accurately recorded.

### Findings

1. The district uses an online purchase requisition system and offers training as needed. Staff indicated that their questions are answered as they arise, and the processing time continues to improve. The district should continue providing an annual in-service before the start of school, including training in the online requisition system and account coding. Training in proper coding of expenditures and handouts of the training materials should be provided to office managers and administrative secretaries who cannot attend the training. Several staff members reported that they need additional training in the proper coding of expenditures.
2. Staff reported that purchase orders are required for all purchases. FCMAT confirmed this based on a sample review of accounts payable documents. The purchasing process and travel reimbursement process are as follows:
  - District procedures require approval of purchases at the district administrative level and any exceptions to the procurement procedures must be approved by administration. Sites/departments are not allowed to enter into contracts, and all contracts require district administrator and county administrator/board approval.
  - The originating site or department completes an online purchase requisition for the authorized manager to approve, and the document is routed electronically to the business office for processing.
  - The Business Services Department checks the account coding and determines whether the total site/department budget has funds for the purchase. Interviews indicated that purchase requisitions with insufficient funds in the designated account may be approved if other site/department accounts have sufficient budget to cover the purchase.
  - Sites and departments can initiate budget transfers electronically using the budget transfer form in Informed K12. Budget transfer requests are not usually processed right away but are held and processed during interim reporting periods.
  - Requisitions are routed electronically to the Purchasing Department after appropriate approvals, where they are processed into a purchase order.
  - Purchase orders are issued to vendors with copies forwarded to the requestor and the Business Services Department. When technology equipment is purchased, a copy is transmitted electronically to the IT Depart-



ment for asset tagging. If a contract is involved, the Business Services Department is responsible for ensuring that it is signed and has county administrator/board approval before the purchase is made.

- Each week, the purchasing assistant reviews requisitions in the purchase order summary report that are not moving through the system, pending approval. The purchasing assistant indicated she sends two reminders to the approver via email before cancelling the unapproved requisition.
  - The Purchasing Department is responsible for determining whether IRS Form W-9 is required for independent contractor reporting and whether the purchase is subject to bid requirements. Purchasing establishes and can make changes to vendors in the system.
  - Requests for conference and travel are completed online using the Travel & Conference/Workshop Pre-Authorization form. Departments/sites are instructed to complete the preauthorization form, secure the supervisor's approval, and send it to the business office. Board policy requires board approval in advance for out-of-state travel, and district procedures require board approval in advance for conference expenses of more than \$500. The Business Services Department administrative assistant puts conference requests for out-of-state travel and expenses of more than \$500 on the board agenda for approval. After the event, the reimbursement forms, with all supporting documentation attached, are sent to the Business Services Department.
  - The proof of delivery/packing slip for merchandise is sent directly to accounts payable. A review of the sample documents provided by the district found that few packing slips are attached to the accounts payable backup. Instead of a signed packing slip, accounts payable may accept a signed copy of the purchase order or invoice as proof of receipt.
  - Interviews with accounts payable staff and written accounts payable procedures indicated that invoices are emailed to sites and departments for approval, and when they are signed and returned electronically, the original invoice is discarded. This is not an effective internal control and can result in duplicate payments.
3. The Business Services Department is responsible for advertising for bids, placing bid information on the district's website, and placing contracts on the board agendas. Interviews indicated that the Purchasing Department obtains two additional quotes for purchases that already have a quote attached to the requisition. However, the samples of accounts payable transactions reviewed included no evidence that two additional quotes were requested or obtained. The district is working on updating/completing a purchasing manual. The district's Purchasing Department SOP does not include all responsibilities for implementing procurement procedures. Following are some of the written procurement procedures:
- The manual indicates "all purchases in excess of \$96,700.00 (Effective January 1, 2021-subject to increase annually) for services, an item or



group of items, shall be made by first securing formal competitive bids. However, the District utilizes a [sic] \$10,000.00 as the threshold to ensure that we stay below the bid requirement.”

However, Public Contract Code (PCC) Sections 20111 and 22002(c) include some bid thresholds that are lower than \$96,700. In addition, Education Code Section 39802 includes a \$10,000 threshold for transportation contracts and states as follows:

In order to procure the service at the lowest possible figure consistent with proper and satisfactory service, the governing board shall, whenever an expenditure of more than ten thousand dollars (\$10,000) is involved, secure bids pursuant to Sections 20111 and 20112 of the Public Contract Code whenever it is contemplated that a contract may be made with a person or corporation other than a common carrier or a municipally owned transit system or a parent or guardian of the pupils to be transported. The governing board may let the contract for the service to other than the lowest bidder.

The information in the Purchasing Department SOP is insufficient to explain how to bid within PCC and Education Code requirements.

- The procedure indicates that the Purchasing Department will get multiple quotes on products or services if they exceed \$500. However, during the current review period, the district purchased items such as office furniture, audiovisual equipment, and cafeteria equipment and no evidence of multiple quotes or bids was attached to the purchasing/accounts payable backup documentation or published on the board agenda.
- The district adopted the California Uniform Public Construction Cost Accounting Act (CUPCCAA), Public Contract Code Section 22000, et. seq., regulations at its June 27, 2014 board meeting. The district’s Purchasing Department SOP includes minimal CUPCCAA information and has been updated to include the current bid thresholds. In 2017, the district provided FCMAT a CUPCCAA Quick Reference Sheet for public works and maintenance projects. This document had various procedures for project awards up to \$187,500 given different conditions based on project costs. It stated it is not applicable for equipment or nonconstruction type services. FCMAT was not provided with an updated CUPCCAA Quick Reference Sheet with updated amounts for the current review period.

At the February 17, 2021 regular board meeting, the county administrator approved resolutions 23/2020-2021, Adopting California Uniform Public Construction Cost Accounting Procedures, and 24/2020-2021, Renewal to Adopt Informal Bidding Procedures Pursuant to the Uniform Public Construction Cost Accounting Act. During this review period, the district provided FCMAT with its CUPCCAA vendor list.

The district has continued to publish bid results in the award of contracts on board agendas, improving bid transparency.



4. The Maintenance, Operations and Transportation Department is responsible for complying with reporting requirements related to the Department of Industrial Relations (DIR) contractor registration program, which began in March 2015. All public works projects having accumulated more than \$1,000 in expenses paid for by a school district, regardless of the funding source, are subject to prevailing wage rates and DIR registration and reporting requirements under SB 854. DIR registration and reporting are not required for contractors who qualify for the small project exemption, which applies to public works projects that do not exceed \$25,000 and maintenance projects that do not exceed \$15,000. The contracts state and purchase orders include a link to the requirements for labor costs procured by the district, including those for the Food Services and Maintenance, Operations and Transportation departments. The district has contracted with PQBids.com to implement DIR registration requirements and develop prequalified applications. DIR certifications were not attached to any of the sample vendor contracts viewed by FCMAT.
5. Authorization to participate in a piggyback bid for “Just in Time” procurement of classroom and office supplies was approved at the June 30, 2021 board meeting. This flexibility requires more communication regarding segregation of duties, tagging procedures, and responsibility to safeguard purchases. Some site personnel were reportedly handling all functions of the transactions: ordering goods, receiving goods, and storing goods.
6. Vendors and/or issuing departments are responsible for tracking an approved signer on an open purchase order. The initiating department may send the list of approved signers to the vendors, but the signers are not always listed on the open purchase order. If a list of approved signers is provided on the original purchase order, interviews with accounts payable staff indicated that they do not verify that the person who received the goods was an approved signer. FCMAT selected a sample of seven open purchase orders and reviewed the invoices paid against them. Five did not list approved signers, and the person signing for the goods was not shown on the invoice for the other two. The purchasing assistant indicated that the approved signer list on file with vendors is verified annually.
7. FCMAT’s interviews found that accounts payable personnel check for proper remittance addresses and refer all new vendors and vendor address changes to the Purchasing Department to ensure proper segregation of duties.
8. Purchase orders, invoices and receiver documents are matched and processed for payment in PeopleSoft. Accounts payable staff reconcile the items, quantities, and prices on the invoices with the purchase order and receiving document. These items are placed in a folder and delivered to the accounting specialist. The accounting specialist ensures the packets are complete to support the warrants, compares the warrants in the system to the documentation provided for accuracy, and reviews them for reasonableness. The CBO checks cash availability then approves the warrants for payment online.

The approval in PeopleSoft triggers the process of issuing warrants at the county office. This process occurs daily. Normal processing time for the county office is approximately four days; however, this period may be extended if the county office places an audit hold on the batch. The county office issues warrants with one signature attached, and the documents are delivered to the Business Services Department.



When commercial warrants are delivered from the county office to accounts payable staff, the staff matches the warrants to invoices and the payment packet, and the CBO signs the warrants as the second signatory. The invoices are stamped as “processed” with the date. Accounts payable staff indicated that they each prepare their own warrants for mailing. The same person who prepared the batch has custody of the warrants once they have been issued by the county office. However, proper segregation of duties would require these two functions be separated.

9. Board Policy 3350-Travel Expenses (revised February 20, 2019), and Administrative Regulation 3350-Conferences and Conventions (revised September 10, 2003), describe the approval and reimbursement processes for travel and conference expenses. District procedures limit the meal allowance to \$50 per day for full-day conferences. The district’s Travel & Conference/Workshop Pre-Authorization Form specifies maximums of \$10 for breakfast, \$15 for lunch and \$25 for dinner. Detailed receipts are required for reimbursement of conference and travel expenses, and the form indicates that if meals are included with a conference, employees no longer qualify for those meal payments. A best practice is to establish specific travel times to qualify for breakfast and dinner. For example, a traveler must have a departure time of before 6:30 a.m. to qualify for the breakfast per-diem payment and a return time of after 6:30 p.m. to qualify for a dinner.

Over the past few years, the IRS has placed additional scrutiny on meal reimbursements or payment of per diems on travel that does not warrant an overnight stay (Internal Revenue Code Section 162(a)(2) Revenue Ruling 75-170). In IRS audits of a county office of education in California, meals that were not associated with overnight stays were deemed to be “living expense and thus a taxable fringe benefit.” If the district includes nonovernight travel in its meal reimbursement policies, it may need to report the payments as taxable income to the employee.

Problems often arise in travel and conference when requests and reimbursements are not processed in a timely manner. Administrative Regulation 3350 states that the convention and travel request form must be submitted at least 30 days prior to the conference registration deadline. Interviews with staff and a review of board meeting minutes confirm that travel and conference requests are sometimes not preapproved. Approximately 23% of the requests for more than \$500 or out-of-state travel listed on the board agendas from March 2021 through February 2022 were not preapproved, including several for administrators.

District employees who travel on school business are considered eligible for state government rates and a waiver of hotel taxes. These items seem minor, but can add up when several people travel, or a single person takes multiple trips. District policy does not specify how an employee qualifies for an overnight stay. This is of particular concern when a conference is within the local geographical area and lasts several days. Education Code Section 44032 requires districts to pay for “actual and necessary” expenses. The expense would be actual for this type of conference because the person stayed in the hotel, but may not be necessary given the geographical location.

The district’s board policy states that employees traveling on school business are expected to travel by the most economical means, and that if two or more persons share automobile transportation, only one shall be entitled to mileage reimbursement.



10. Interviews with staff indicate that the district has issued credit cards to four administrators. These cards are regular business credit cards, allowing all purchases with limits from \$5,000 to \$20,000. The district has no written policy or procedure for cancelling a credit card if a cardholder leaves the employment of the district. The district does not require all individuals using district credit cards to read and sign a credit card user agreement acknowledging receipt of the card, terms of use and reimbursement procedures.
11. FCMAT requested samples of the district's accounts payable transactions for testing the fiscal years 2020-21 and 2021-22. Of the 25 items tested, the following anomalies were noted:
  - Twenty invoices were paid more than 30 days after the invoice date and seven of the 20 were paid more than 90 days after the invoice date. Six were dated prior to the date of the purchase order.
  - One of the 25 invoices was paid for consultant services that were performed prior to the date of the purchase order. Documentation was not included with the consultant services agreements to indicate that the district applied the three-part (ABC) test to determine if the consultants should be properly classified as independent contractors. There was no documentation to support whether the district inquired about the consultant's status as a retiree of STRS or PERS for reporting purposes.
  - An invoice for \$10,032.63 was paid for vehicle repairs on an open purchase order. The district's purchasing procedures prohibit purchases of items on an open purchase order with a value of more than \$500.
12. Administrative Regulation 3440 (revised February 20, 2019), Inventories, complies with the Education Code Section 35168 requirement that the governing board establish and maintain an inventory of all equipment items with a current market value of more than \$500. GASB Statement No. 34 requires fixed asset records to be maintained in a complete, accurate and detailed manner and specifies that fixed asset records include acquisition date, historical cost, depreciation and useful life of the asset. Capital assets are to be reported at historical cost and are defined as land, improvements to land, easements, buildings, building improvements, vehicles, machinery, equipment, works of art and historical treasures, infrastructure, and all other tangible and intangible assets that are used in operations and that have initial useful lives extending beyond a single reporting period. When federal funds are used for a purchase, the district is required to include additional information in its inventory records, including the funding source, titleholder, and percent of federal participation (2 CFR 200.313 and 5 CCR 3946). At least once every two years, a physical inventory of equipment must be conducted, and the results reconciled with the property records (2 CFR 200.313).
13. On February 17, 2021, the district awarded a contract to CBIZ Valuation Group to perform a capital asset inventory and valuation, barcode tagging, and reconciliation to the district's existing fixed asset list. Interviews and documentation support that a physical inventory, bar coding and asset tagging took place. However, there is no evidence that an exception report was produced. (See Standard 16.1 for additional details).



14. Interviews with employees indicated that fixed asset items, not related to technology, that were purchased or donated after the physical inventory was completed have very likely not received asset tags. No documentation was provided that accounts for current year inventory additions, or items on prior inventory lists that were removed because of disposals, shrinkage or theft. As is discussed in more detail in Standard 15.8 and 16.1, the district's inventory has not been maintained in a dedicated inventory system, and there have been gaps in the district's internal controls that can allow items to be received, but not tagged or included in the equipment inventory. During a prior review period, staff was aware of incidents when purchased goods could not be located for tagging because they were reported stolen. Disposals, shrinkage and/or theft of items valued at less than \$5,000 has not been systematically tracked, and the items have not been removed from the fixed asset inventory list. This may perpetuate the misstatement of assets in the financial reports.
15. Several years ago, the district eliminated a large central warehouse and began to use a small warehouse adjacent to the maintenance yard and allowed district office and site staff to receive supplies and technology items directly. Most items are shipped directly to the sites and departments. The distribution and inventory coordinator position will be responsible for managing the inventory database and updating and tracking district inventory; however, the individual in the position has not yet been trained in those duties.

## **Recommendations for Recovery**

1. The district should continue to provide employees who use the online requisition system with an annual in-service that focuses on how to use the purchasing module and the proper account coding of requisitions and should consider making the training mandatory.
2. The review of approved signers on open purchase orders is a district office function that should be assigned to district office staff. Approved signers should be determined by the department requesting the open purchase order, and the names should be printed on the open purchase order. By adding this information, accounts payable staff can identify approved signers.
3. The business office should continue to audit all invoices.
4. The Business Services Department should make budget transfers initiated by departments and sites in a timely manner. Purchases and new positions submitted for approval should be rejected until sufficient funds are transferred to cover the purchase or pay for the position.
5. All vendors should be notified in writing that invoices received without a valid purchase order number, listed on the invoice, will be returned without further processing.
6. The district's purchasing procedures and the Purchasing Department SOP should be reviewed and revised annually. Board policy and administrative regulations on procurement and bidding should be adopted and/or revised as necessary.



7. To identify cumulative purchases that must be bid, the Purchasing Department should complete all capital purchases that are not bid as part of new construction projects.
8. The Purchasing Department should obtain quotes as prescribed in the district's purchasing procedures and attach a copy to the accounts payable file as supporting documentation.
9. The district should ensure that it has sufficient qualified staff in the Purchasing Department that are trained in procurement practices and requirements.
10. The district should ensure that it has completed all the required steps to implement CUPCCAA and provide training regarding this procurement process to applicable staff members. Staff members involved in purchasing should have access to district procedures as well as Public Contract Code training.
11. Purchase orders for labor of more than \$15,000, not covered by CUPCCAA, should be bid where required by the Public Contract Code.
12. To adequately segregate duties, the district should continue to ensure that only the Purchasing Department can establish a new vendor or make changes to vendor information. Purchasing staff should not receive items or approve invoices for payment.
13. Packing slips should be attached to invoices as the preferred proof of receipt. The Purchasing Department should receive packing slips, follow up on any missing or damaged items, then forward the packing slips to Accounts Payable.
14. To strengthen internal controls and reduce the risk of duplicate payments, the district should discontinue its practice of discarding original invoices and should retain all original invoices.
15. The district should continue to ensure that cash balances have been reviewed and any concerns have been addressed before an accounts payable batch is processed. When the district's processing time to produce a warrant has been diminished, the district should consider issuing warrants less than daily.
16. All accounts payable warrants should be returned to personnel other than the employee who processed the transaction.
17. Care should be exercised in reviewing accounts payable packets before authorizing issuance of payment. Contracts should be attached to the backup documents.
18. The district should revise its travel and conference board policies and administrative regulations to include items such as specific times for breakfast and dinner per diems, use of state government rates, qualifications for an overnight stay, and requirement for overnight stay to qualify for meal per diem. The district should also consider using a waiver for hotel taxes.

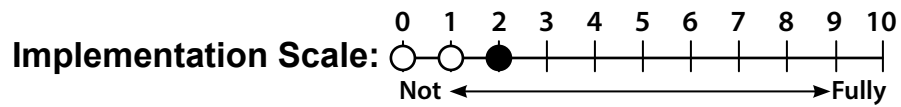


19. The district should implement a procedure to ensure district credit cards are cancelled when a cardholder terminates employment with the district.
20. The district should require managers who have access to credit cards to read and sign a credit card user agreement acknowledging receipt of the card, terms of use and reimbursement procedures.
21. The district should ensure that it complies with the DIR contractor registration requirements and attach the DIR certification to purchase order backup. The district website and purchase order terms and conditions should be updated to reflect current regulations.
22. Additional procedures and internal controls, such as segregation of duties, should be implemented for “Just in Time” office supply and custodial procurement contracts.
23. The district should ensure that the same individual is not assigned to approve purchase orders and warrants online. Invoices should be paid in a timely manner, and district employees should obtain timely approval for travel that requires county administrator/board approval.
24. The district should apply the three-part (ABC) test to consultants to ensure that they are properly classified as independent contractors or employees and require consultants to complete a form identifying their status as retirees of STRS or PERS for proper tracking and reporting.
25. The district should ensure that supervisors adhere to policies prohibiting the purchase of items valued at more than \$500 on an open purchase order.
26. The district should centralize all purchasing, bidding, tagging and salvage procedures. This would ensure that one individual or department is responsible for all items districtwide. This would centralize knowledge, standardize procedures and increase accountability.
27. The district should perform a physical inventory of all items with a current market value of \$500 or more every two years to conform to Education Code Section 35168 and 2 CFR 200.313. The district should consider an annual physical inventory until all items are tagged, and all procedures are fully implemented. All purchases and donations that fall into reportable categories should be accounted for.
28. The district should assign the roles and responsibilities to employees to maintain an inventory control system. Employees responsible for identification of applicable assets and those responsible for asset tagging should be cross-trained on their responsibilities.
29. The district should ensure that the inventory is continually updated for additions and deletions.
30. The inventory list should be annually reconciled to the accounting records of items purchased using object codes 4400, 6400, and 6500.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	0
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	1
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 11.1 Student Body Funds

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### Legal Standard

The board adopts board policies, regulations and procedures to establish parameters on how student body organizations will be established and how they will be operated, audited and managed. These policies and regulations are clearly developed and written to ensure compliance regarding how student body organizations deposit, invest, spend, and raise funds. (EC 48930-48938)

### Findings

1. The district adopted BP 3452-Student Activity Funds, at its February 20, 2019 board meeting. Board policy and administrative regulations and procedures governing associated student body should be communicated with the appropriate staff to ensure they are fully implemented at all school sites operating ASBs.
2. The district fails to provide adequate guidance or procedures that outline how associated student body organizations are to operate including district-level oversight even though it has historically requested outside agencies to perform fraud audits of the ASB. The district is required to provide proper supervision of ASB in accordance with Education Code Section 48937, which states the following:

The governing board of any school district shall provide for the supervision of all funds raised by any student body or student organization using the name of the school.

On August 30, 2021, the district hired a director of fiscal services who has recently been assigned to oversee the ASBs.

3. Some of the district's ASB organizations use the downloadable copy of FCMAT's Associated Student Body Accounting Manual, Fraud Prevention Guide and Desk Reference. However, the district has not implemented previous recommendations to provide written internal guidelines and procedures for ASB that provide direction to ASB personnel, ensure effective administrative oversight, and clearly define the roles and responsibilities of all personnel involved in managing student body activities and funds.
4. School sites continue to use various software programs to track ASB financial transactions such as deposits and check register and club account balances. As mentioned in previous review periods, the district should have uniform financial software to prepare the school sites' monthly financial documentation that can also be accessed by the Business Services Department.

The district engaged a consultant several years ago that converted all the manual and spreadsheet ASB systems to QuickBooks, accessible from the district's centralized network. Districtwide information was loaded on a common district server, yet the process was not completed and implemented at school sites. Several years ago, the IT Department purchased QuickBooks software for a second time but did not provide training in its use to school site staff members responsible for ASB.



Interviews indicated that instead of using QuickBooks, which was never implemented districtwide, the district has implemented the ASBWorks accounting software at its high schools during this review period, with access for business office staff to view financial transactions. At the time of fieldwork, the district was in the process of centralizing the middle schools' ASB deposit and payment functions at the district office and consolidating the middle schools' ASB bank accounts to a district-controlled account.

5. High school ASB staff indicated that the business office requested copies of bank reconciliations in December 2021 and stated that district staff had no follow-up questions. District documents show that the business office recently began requesting monthly bank reconciliations and income statements from middle schools that have not yet transferred ASB funds to the centralized bank account. However, at the time of FCMAT's fieldwork, most sites had not yet responded to these requests. To provide adequate district-level oversight, the district should assign a business office staff member to routinely collect and review ASB financial reports, including bank reconciliations, and perform random sampling of revenue and expenditure transactions.
6. At the two sites FCMAT selected for review of student body accounts, interviews with middle school staff indicated that the ASB club advisor counts funds with the office manager, they sign a cash count form and put the money in a sealed bag in the safe, and the principal or office manager takes the deposit to the business office. The site's ASB funds are centralized at the district office. Interviews with high school staff indicated that the ASB clerk collects the cash from the sale of student store items and sometimes counts the money by themselves if another person is not available. Money is kept in the safe, and the ASB clerk and advisor count the cash together when the deposit is prepared, both sign a cash count form, and the ASB clerk takes the deposit to the bank. The ASB clerk completes the bank reconciliation, but indicated it is not reviewed by another site employee. Effective internal control procedures and best practices require that an employee counts all cash in the presence of another employee and that a deposit slip is completed and signed by both individuals. A different employee should then be assigned to verify that the total shown on the deposit slip matches the amount deposited at the bank.
7. Education Code Section 48933(b) requires that all ASB expenses be approved before funds are expended. Interviews with staff indicated that ASB expenses are preapproved; however, the 2020-21 annual audit stated that of the two cash disbursements tested at one school site, one of the disbursements was not approved by a district representative, ASB advisor and student representative.

The ASB Check Request Voucher for middle schools and the Check Request Form and Purchase Order Form used by the high school site that FCMAT selected for review include signature lines for the three required approvers. In addition, the high school's forms include a statement certifying that the request has been approved by the ASB and a line to enter the date of the respective ASB meeting.

8. In a prior review period, interviews with staff indicated that students were required to purchase PE uniforms from the student store. Students who could not afford to purchase the uniforms were referred to the parent center at the district office to obtain a



voucher to receive a free uniform. The California attorney general has issued an opinion that indicates charging for standardized gym clothes for physical education classes, or uniforms, is not allowed. A student's grade cannot be adversely affected by not wearing the standardized clothes when the failure to wear these clothes is beyond the student's control. Interviews also indicated that schools sold caps and gowns for eighth-grade graduation ceremonies. Education Code Section 49011 states that pupils shall not be required to pay a fee for participation in an educational activity. In the current review period, ASB staff reported that the ASB no longer sells PE uniforms or caps and gowns.

## **Recommendations for Recovery**

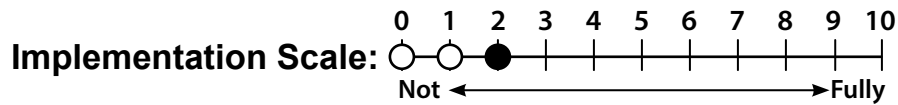
1. The district should share BP 3452 with school site administrators, student body advisors, and staff performing bookkeeping roles at the school sites, as well as district office personnel who are assigned to oversee ASB activities.
2. The district should ensure that all staff responsible for ASB bookkeeping have the knowledge, skills, and training necessary for those duties.
3. The district should implement procedures on how ASBs should invest, spend, and raise funds and ensure adequate internal controls are established following procedures outlined in the FCMAT manual.
4. The district should develop and implement standardized forms for fundraising, cash collection, and disbursement to be used by all school sites operating an ASB.
5. The district should develop and implement procedures for adequate district-level oversight of student body funds and internal audits by assigning a business office staff member to routinely collect and review ASB financial reports, including bank reconciliations, and perform random sampling of transactions. The district should hold sites accountable for providing the requested information.
6. The district should develop and implement written internal ASB procedures that provide direction to staff, ensure effective site administrative oversight, and clearly define the roles and responsibilities of personnel involved in managing student body activities and funds.
7. The district should continue to implement the ASBWorks software and provide staff training to streamline ASB accounting. The district should also continue to ensure that district office staff have access to view financial information in the software system.
8. If the district continues to centralize middle school ASB bank accounts and check writing duties at the district office, it should ensure that duties are properly segregated.
9. The district should ensure that all ASB expenses are approved in accordance with Education Code Section 48933(b) before funds are expended. It should also ensure that standardized purchase and check request forms include the ASB meeting date when the purchase was approved and signatures for all three required approvers.



10. The district should ensure that effective internal control procedures are implemented inclusive of requiring two employees to count cash together and complete and sign the deposit slip, assigning another employee to verify that the total shown on the deposit slip matches the amount deposited at the bank.
11. The district should continue to ensure that students are not charged any unallowable fees.

### Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	0
July 2018 Rating:	0
July 2019 Rating:	1
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	2





## 11.3 Student Body Funds

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### Legal Standard

The LEA provides annual training and ongoing guidance to site and LEA personnel on the policies and procedures governing Associated Student Body accounts. Internal controls are part of the training and guidance, ensuring that any findings in the internal audits or independent annual audits are discussed and addressed so they do not recur.

### Findings

1. The Business Services Department is responsible for ASB oversight, internal audit, and training, but does not have written protocols, processes, or procedures for these functions. Oversight procedures are necessary to provide direction to ASB staff and ensure effective administrative oversight and should clearly define the roles and responsibilities of personnel involved in managing student body funds and activities.

FCMAT has cited the lack of ASB oversight in several previous reviews, and the 2019-20 and 2020-21 annual audits continue to include a finding regarding the lack of internal controls and oversight of ASB funds. However, as discussed in Standard 11.1, the business office has not provided adequate oversight of the ASB organizations operating at several district school sites, which violates Education Code Section 48937. During this review period, the district hired a director of fiscal services who has recently been assigned to oversee the ASBs.

2. Periodic internal audits provide an opportunity for ASB bookkeepers to be trained on proper procedures and to correct deficiencies that can lead to audit findings. FCMAT found that the district does not conduct periodic internal audits of ASB programs to test and ensure compliance.
3. The district's annual audited financial statements continue to include a reoccurring ASB audit finding. The most recent audit completed by the external auditor for the fiscal year ended June 30, 2021 included Finding 2021-003 – Associated Student Body Funds. The audit identified the finding as a material weakness and stated that the district could not aggregate ASB data for financial reporting as required by GASB 84. The finding also stated the following:

... there was no review process of ASB accounting [...] Due to this lack of oversight, the District is unable to determine if all ASB accounts have been properly reported. There is a risk that ASB accounts could be misstated and that this misstatement would go undetected by the District Office.

The audit indicated that the lack of internal controls and oversight by the district office could lead to loss or misappropriation of ASB assets and a risk that student body funds are not used for students' benefit. This finding is repeated from prior audit periods. Repeat audit findings should be of great concern to district administrators. However, interviews indicated that audit findings have not been provided to school site ASB staff.



4. The district has not established written procedures to ensure that ASBs collect all W-9 forms and provide the district with payment information, so it can issue 1099s as required by IRS regulations. The entire independent contractor process should be centralized through the district office, and training provided to the school sites that includes procedures for schools that have organized ASBs to send W-9 forms to the district office. During this review period, the business office collected a list of vendor payments from school sites to determine which vendors should be issued 1099s. One ASB clerk indicated that W-9 forms are kept at the school site but that some vendors have not provided a W-9.
5. FCMAT has found that the schools operating an ASB program have created forms for revenue collection and some expenditure documents along with various formats for taking meeting minutes. Some schools have developed formalized written procedures, and others have rough handwritten notes. The district has recently developed a few standardized ASB procedures and forms for its middle schools (e.g., ASB Check Request Voucher and Deposit Slip).
6. ASB staff indicated that they need initial and/or additional training. Some staff members are new to their ASB roles and have not received any ASB training from the district office. Other than a meeting on November 18, 2021 to discuss centralizing the ASB deposit and payment functions at the district office and consolidating the ASB bank accounts to a district-controlled account, the district did not provide ASB training during this review period. The most recent ASB training occurred on November 5, 2020, which included discussion of roles and responsibilities, fundraising and cash collection, disbursements, and internal controls. This training event was hosted by the Business Services Department.

## **Recommendations for Recovery**

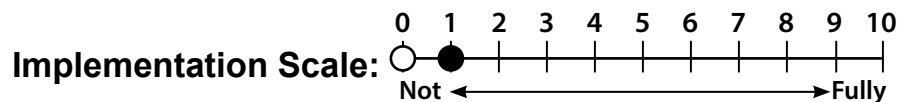
1. Written oversight procedures should be established to provide direction, ensure effective oversight, and define the roles and responsibilities of personnel involved in managing student body activities and funds.
2. The district should provide training for district-level personnel to conduct internal audits of ASB funds, and the business office should conduct periodic internal audits of ASB funds to test for and ensure compliance.
3. The district should ensure that proper oversight is conducted at the district office level and that audit findings are reviewed with applicable school site staff and site administrators to ensure corrective action and avoid repeat audit findings.
4. The independent contractor process should be centralized, and procedures should be implemented to ensure ASBs collect W-9s and send the forms and vendor payment information to the district's accounts payable staff so the district can issue 1099s as required by IRS regulations.
5. The district should provide a consistent format for forms used in the collection of ASB revenues, recording of expenditures, and recording of meeting minutes.



6. The district should provide training, for both new employees and annually, that include topics such as processes and procedures, internal controls and review of audit findings for all employees who are responsible for ASB funds. The district should make such training mandatory for all applicable employees and administrators and ensure that attendance rosters are completed for all trainings.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	0
July 2018 Rating:	1
July 2019 Rating:	1
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	1





## 12.1 Multiyear Financial Projections

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### Legal Standard

The LEA provides a multiyear financial projection for at least the general fund at a minimum, consistent with the policy of the county office. Projections are done for the general fund at the time of budget adoption and all interim reports. Projected fund balance reserves are disclosed, and assumptions used in developing multiyear projections that are based on the most accurate information available. The assumptions for revenues and expenditures are reasonable and supported by documentation. (EC 42131)

### Findings

1. The district's reports for the following periods all included MYFPs for the general fund in accordance with AB 1200 and AB 2756 requirements for the current and subsequent two fiscal years.
  - 2020-21 second interim report
  - 2021-22 adopted budget
  - 2021-22 first interim report
2. Board presentations for the current year and multiyear financial projections should include a description of budget assumptions used in the MYFP and illustrate the financial impact of those assumptions, such as changes in revenues, expenditures and fund balance. Additionally, the district should provide a summary table of the multiyear financial projections that reflects the district's financial position. This is an effective practice to help those affected more easily understand the district's fiscal position. FCMAT found that the district has included a MYFP table as part of its board presentations that illustrates the year-over-year change in the current and multiyear financial projections. However, the board presentation does not include the detailed assumptions used to create the subsequent fiscal years. All board presentations given during the review period included a slide for MYFP and the dollar amount of reserves, but the slides did not separate the unrestricted and restricted general fund impacts and it did not include the available reserve percentage.
3. The district has continued to include detailed assumptions in the board agenda backup materials with each of its required budget submissions. However, the district is not consistent with the extent of details provided with each of the required budget submissions. The assumption narratives included the FSP, and some of the supporting assumptions provided information in the following areas:
  - Student enrollment trends
  - Projected enrollment
  - Unduplicated Pupil Count
  - Increases in CalSTRS and CalPERS
  - Use of one-time revenues



- Deficit spending and reserves
- Special education costs

However, assumptions are lacking detail in the following areas:

- Step and/or column increases
- Health insurance increases
- Staffing reductions that correlate to the amounts projected in the district's FSP and MYFP
- The district's increases/decreases in contributions to restricted programs
- A summary table of the multiyear financial projections for unrestricted and restricted sources that reflect the district's financial position, including the available reserve percentage

The district's assumption narratives have not consistently included the cohort survival factors with the enrollment projections, and average daily attendance projections are still not included. Due to the COVID-19 pandemic, the state provided a hold harmless provision for 2020-21 ADA, which allowed the use of 2019-20 ADA as a proxy for 2020-21. Not reporting 2020-21 attendance for apportionment purposes provides an additional one-year reprieve of the impact of declining enrollment/ADA in 2021-22. However, for districts with year-over-year ADA declines, the full impact of the declines will be realized in 2022-23.

Although the assumptions provided with the board agenda backup materials are more than what was provided with some of the past budget submissions and continue to evolve each budget reporting period, the focus remains on the current year, and no detailed document that describes all the assumptions used to develop each year of the district's general fund MYFP is presented. The district's 2021-22 first interim report assumptions narrative included a table of various rate assumptions however, the presentation did not include the multiyear impact on the district's financial position. A best practice is to include a summary list of key assumptions used in the development of the district's budget and MYFP in the narrative document.

4. The MYFP is a key tool in assessing the district's ongoing fiscal sustainability by taking the base year budget and projecting the future years with locally known assumptions and trends. If the base year is underbudgeted or overbudgeted, the reliability of the projections for the two subsequent fiscal years is affected and may not reflect an accurate picture of the district's financial status. As discussed in Standard 7.2, the district has a pattern of overbudgeting expenditures. FCMAT's analysis of the 2021-22 first interim report also shows that several expenditure categories appear to be overbudgeted, which ultimately affects the MYFP for the two subsequent fiscal years.
5. The district develops its MYFP using the SACS software along with Excel spreadsheets for supporting information. The district implemented FCMAT's recommendation and prepared the district's 2021-22 first interim MYFP at each resource level. In prior reporting periods, the district focused only on programs that have required a contribution from the unrestricted general fund. With all the additional one-time funding that the district is



receiving, it is imperative that the district track the expenditures and monitor ending balances to ensure that each program does not deficit spend and require a contribution from the unrestricted general fund. Additionally, the district should ensure that one-time funds are not used for ongoing costs. Developing MYFPs at each resource level can provide a greater level of detail and accuracy and better financial planning.

6. AB 1840 was passed by the legislature on August 31, 2018 as a budget trailer bill and became effective on September 17, 2018. Among other provisions, AB 1840 provides for several changes in the oversight of fiscally distressed districts and establishes specific requirements for the district in exchange for providing financial resources under certain circumstances.

AB 1840 changes the former statecentric system to be more consistent with the principles of local control. Several duties formerly assigned to the SPI are now assigned to the county superintendent, with the concurrence of the SPI and the president of the State Board of Education. While AB 1840 does not change the definition of or criteria for fiscal insolvency, it does change the structure of how fiscally insolvent districts are administered once a state emergency appropriation has been made. Additionally, AB 1840 established Education Code Section 42161, which states:

- (a) For the 2018–19 fiscal year, the Inglewood Unified School District shall do both of the following:
  - (1) Meet the requirements for qualified or positive certification for the school district’s second interim report pursuant to Article 3 (commencing with Section 42130) of Chapter 6.
  - (2) Complete comprehensive operational reviews that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability.
- (b) Beginning with the 2019–20 fiscal year, the Budget Act shall include an appropriation for the Inglewood Unified School District, if the school district complies with the terms specified in subdivisions (a) and (c), in the following amounts:
  - (1) For the 2019–20 fiscal year, up to 75 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.
  - (2) For the 2020–21 fiscal year, up to 50 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.
  - (3) For the 2021–22 fiscal year, up to 25 percent of the school district’s projected operating deficit, as determined by the County Office Fiscal Crisis and Management Assistance Team, with concurrence with the Department of Finance.



- (c) Disbursement of funds specified in subdivision (b) shall be contingent on the Inglewood Unified School District's completion of activities specified in the prior year Budget Act to improve the school district's fiscal solvency. These activities may include, but are not limited to, all of the following:
- (1) Completion of comprehensive operational reviews that compare the needs of the school district with similar school districts and provide data and recommendations regarding changes the school district can make to achieve fiscal sustainability.
  - (2) Adoption and implementation of necessary budgetary solutions, including the consolidation of school sites.
  - (3) Completion and implementation of multiyear, fiscally solvent budgets and budget plans.
  - (4) Qualification for positive certification pursuant to Article 3 (commencing with Section 42130) of Chapter 6.
  - (5) Sale or lease of surplus property.
  - (6) Growth and maintenance of budgetary reserves.
  - (7) Approval of school district budgets by the Los Angeles County Superintendent of Schools.
- (d) Funds described in subdivision (b) shall be allocated to Inglewood Unified School District upon the certification of the County Office Fiscal Crisis and Management Assistance Team, with concurrence from the Los Angeles County Superintendent of Schools, to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance that the activities described in subdivision (c), as specified in the prior year Budget Act, have been completed. Additionally, by March 1 of each year, through March 1, 2021, the County Office Fiscal Crisis and Management Assistance Team, with concurrence from the Los Angeles County Superintendent of Schools, shall report to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance the progress that Inglewood Unified School District has made to complete the activities described in subdivision (c), as specified in the prior year Budget Act.
- (e) The activities described in subdivision (c) shall be determined in the annual Budget Act based on joint recommendations from the County Office Fiscal Crisis and Management Assistance Team and the Los Angeles County Superintendent of Schools. These recommendations shall be submitted to the Assembly Committee on Budget, Senate Committee on Budget and Fiscal Review, and the Department of Finance by March 1 of each fiscal year, through March 1, 2021, in conjunction with the certification described in subdivision (d).



- (f) Until June 30, 2019, the Superintendent may waive the reimbursement determination specified in Section 18054 of Title 5 of the California Code of Regulations for Inglewood Unified School District's 2016–17 fiscal year California state preschool program contract in order to resolve the school district's outstanding child development reimbursement liability to the state.

The Budget Act of 2020, SB 74 (Chapter 6/2020, Section 2), approved by the governor on June 29, 2020, made an appropriation contingent on the district's completion of both of the following: 1) adoption and implementation of necessary budgetary solutions, and 2) adoption of a preliminary school and district facility closure and consolidation plan and initiation of any regulatory approval process related to the sale or lease of surplus property.

- 7. Second Interim Report 2020-21: The county administrator approved the 2020-21 second interim financial report on March 10, 2021 with a positive certification. The district's narrative accompanying its second interim report stated that its previously projected operating deficit was significantly reduced due to the use of one-time COVID-19 revenues that were not identified in the 2020-21 adopted budget. This \$20.5 million in additional funds, known as ESSER II, is anticipated to be spent in fiscal years 2021-22 and 2022-23. The narrative pointed out that these additional funds are one-time and that the district will still need to address deficit spending and its ongoing structural deficit. The district's second interim report reflects total available reserves of 3% for the current and two subsequent fiscal years. However, the district has also included an assigned amount of \$23.7 million in 2020-21, \$34 million in 2021-22 and \$29.5 million in 2022-23. Since the district's second interim report was certified as positive, the district was not required to submit a third interim report.

The district's FSP submitted with its 2020-21 second interim report projects a reduction to the RRMA expenditures of \$450,000 in both 2021-22 and 2022-23. The district's contribution of \$4,190,564 to the RRMA account for 2020-21 exceeds the required 3%, by \$168,760 per the criteria and standards review section of the budget report. However, with the reduction of \$450,000 to the RRMA account as projected, it is likely that the district will not meet the required minimum contribution for each of those fiscal years.

On April 15, 2021, the county office completed a review of the district's second interim report and concurred with the district's positive certification, which included an updated FSP, reflecting cost savings and expenditure reductions of \$3.6 million in 2021-22 and an additional \$3.6 million in 2022-23. Additionally, the county office pointed out that the district relied on apportionments under AB 1840 and included the projected funding in fiscal year 2020-21. The county office letter also expressed concerns with the district's rising special education program costs, the continued impact of declining enrollment, and deficit spending and the impact it could have on the district's recovery plan. Therefore, the county superintendent required an updated FSP that addresses the deficit spending with the district's 2021-22 adopted budget.

- 8. Adopted Budget 2021-22: The district's adopted budget includes an assumptions narrative; however, as stated previously, the district is not consistent with the extent of details provided and lacks detailed assumptions that explain adjustments for the two subsequent fiscal years.



The district did not provide backup documentation that explained the adjustments made in the subsequent fiscal years compared to the current year. For example, a district typically applies a flat ongoing percent to estimate the subsequent fiscal years' step and/or column adjustment. The district's MYFP shows a negative 4.43% step-and-column adjustment to restricted classified salaries in 2022-23. This is likely due to changes in FTEs from one year to the next. However, an increase or decrease in FTE is a separate decision and calculation from the step and column adjustment and should be shown on the MYFP as other salary adjustments. This does not mean a district cannot have a negative or cost savings in step and column, but it is rare. The best practice would be to complete the salary comparison between prior year and current year, holding the number of FTEs constant. Should there be a savings (or cost) due to the difference in a separating employee's salary and the replacement employee's salary, the savings (or cost) would be combined with the change in salaries calculation. The county administrator approved the district's 2021-22 adopted budget on June 30, 2021. The assumptions narrative recognized that the district's prior projected operating deficit was significantly reduced due to a combination of one-time COVID-19 revenues and the ADA hold harmless provisions. Although the unrestricted general fund budget showed a projected deficit of \$2 million in fiscal year 2022-23 and \$4.7 million in 2023-24, the adopted budget submitted to the county superintendent showed a reserve for economic uncertainties of 3.01% for 2021-22, 3% for 2022-23, and 3% for 2023-24. However, the district also included an assigned amount of \$34 million in 2021-22, \$32.2 million in 2022-23 and \$27.9 million in 2023-24. FCMAT's March 1, 2021 analysis of the district's projected 2021-22 budget as part of its responsibilities under AB 1840 found that there would be no projected deficit; therefore, the district did not qualify for an AB 1840 apportionment.

In a letter dated September 15, 2021, the county superintendent approved the district's adopted budget. However, the county office letter pointed out that the district must continue to implement the reductions identified in its FSP and required the district to submit an updated plan with its 2021-22 first interim report. Additionally, the county office had concerns with the district's declining enrollment, deficit spending, special education contribution, and cash flow.

The district's adopted budget projected operating deficits of \$688,817 in the cafeteria fund (fund 13), \$46.4 million in the building fund (fund 21), \$552,403 in the capital facilities fund (fund 25), and \$4.3 million in the special reserve fund for capital outlay projects (fund 40).

The district continues to experience declining enrollment reportedly caused by both declining birthrates and the number of students who reside within district boundaries. As shown on Form MYP, the projected ADA is estimated to be 7,086.40 in 2021-22, 7,121.00 in 2022-23, and 6,684.00 in 2023-24. Additionally, the number and size of charter schools that operate both within and outside, and adjacent to, the district's boundaries have a direct impact on enrollment.

9. First Interim Report 2021-22: The district's first interim assumptions narrative discusses the enrollment trends and the projections for the subsequent fiscal years. Additionally, the narrative provides information about the LCFF factors used when projecting the current and subsequent fiscal years' funding for COLA, enrollment and current year UPP. However, the district did not include the cohort survival factors used for estimating



enrollment. The district's narrative explained the decline in LCFF funding in the subsequent fiscal years due to the ADA hold harmless provisions and how these provisions had significantly impacted the district's projected LCFF revenues in fiscal year 2022-23. The district did not include details regarding the ADA projections used in the multiyear projections, nor did the assumptions comment on the district's current attendance rate as it compares to prior fiscal years, which is also affecting the district's LCFF revenues.

The county administrator approved the district's 2021-22 first interim report on December 15, 2021 with a positive certification. The district's MYFP showed a reserve for economic uncertainties of 3.05% for 2021-22, 3.01% for 2022-23, and 3.07% for 2023-24. However, the district also included an assigned amount of \$35.21 million in 2021-22, \$36.25 million in 2022-23 and \$35.17 million in 2023-24. The district projects to deficit spend \$1.18 million in the unrestricted general fund in fiscal year 2023-24.

The district's 2021-22 first interim report submitted to the county superintendent included an updated FSP, reflecting expenditure reductions and revenue enhancements totaling approximately \$4.86 million in 2022-23, and an additional \$1.13 million in expenditure reductions in 2023-24. The district's FSP submitted with its 2021-22 first interim report projected a reduction to the RRMA expenditures of \$715,972 in 2022-23 and \$400,000 in 2023-24. The district's budgeted and required contribution to the RRMA account in 2021-22 is \$4,132,379 per the criteria and standards review section of the interim report. However, with the projected reduction to the RRMA account of \$715,972 in 2022-23 and \$400,000 in 2023-24, the district will likely not meet the required minimum contribution for either of those fiscal years.

The county office completed its review of the district's first interim report and the updated FSP and concurred with the district's positive certification. In a letter dated January 19, 2022, the county office recognized that the district projects unrestricted general fund operating surpluses for 2021-22 and 2022-23, but pointed out that the district projects an operating deficit of \$1.18 million in 2023-24. The district was instructed to update the FSP and include it with its 2021-22 second interim report. The county office noted concerns with the district's continued declining enrollment and the impact it has on revenues. The county office recommended that the district continue to assess and adjust staffing needs and facility planning based on the projected rate of decline in its enrollment.

The table below summarizes the district's first interim projected surplus/(deficit), fund balance and reserves for the current and two subsequent fiscal years (dollar amounts are shown in millions). The district designated an assigned amount in its fund balance, the table below identifies the district's reserve percentage with and without that assignment.



Surplus/(Deficit) Spending	2021-22	2022-23	2023-24
Unrestricted General Fund	\$10.68	\$0.02	(\$1.18)
Restricted General Fund	(\$3.24)	\$0.14	\$0.22
Combined General Fund	\$7.44	\$0.16	(\$0.96)
Ending Fund Balance	2021-22	2022-23	2023-24
Unrestricted General Fund	\$40.61	\$40.63	\$39.45
Restricted General Fund	\$11.13	\$11.27	\$11.48
Combined General Fund	\$51.74	\$51.90	\$50.93
Reserves	2021-22	2022-23	2023-24
Unrestricted General Fund Balance	\$40.61	\$40.63	\$39.45
Assigned Fund Balance	\$35.21	\$36.25	\$35.17
Available Reserve Amount	\$5.40	\$4.20	\$4.10
Reserve Percent (w/o assignment)	3.05%	3.01%	3.07%
Reserve Percent (with assignment)	22.94%	29.08%	29.57%

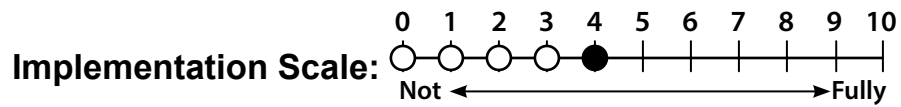
## Recommendations for Recovery

1. A comprehensive detailed list of MYFP assumptions should be included in the budget and interim report documents that are presented to the county administrator/board at each reporting period.
2. The district should continue to communicate to all those affected the foreseeable impact of the diminished LCFF revenues in fiscal year 2022-23 and beyond because of the declines in enrollment and ADA and the end of the pandemic-related hold harmless provisions.
3. To provide for greater accuracy and more detailed financial planning, the district should continue to develop its MYFP's at the resource level.
4. Presentation materials provided to the county administrator/board at each budget reporting period should continue to include details for the two subsequent fiscal years that reflect the district's financial position.
5. The district should continue to identify measures to enhance revenue and/or reduce expenditures and eliminate its structural deficit.
6. The district should review all budgets and actual expenses at least monthly and make necessary adjustments to help prevent variances between budgeted and actual expenses at year-end and accurately complete multiyear financial projections.
7. The district should monitor and update the FSP to ensure its reserves for economic uncertainties are met.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	3
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	4





## 12.2 Multiyear Financial Projections

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### Legal Standard

The governing board ensures that any guideline developed for collective bargaining fiscally aligns with the LEA's multiyear instructional and fiscal goals. Multiyear financial projections are prepared for use in decision-making, especially whenever a significant multiyear expenditure commitment is contemplated, including salary or employee benefit enhancements negotiated through the collective bargaining process. (EC 42142)

### Findings

1. The district's 2021-22 first interim report does not project deficit spending in the unrestricted general fund in fiscal years 2021-22 or 2022-23. The district's FSP, approved with the 2021-22 first interim report, included expenditure reductions and revenue increases totaling approximately \$4.9 million in 2022-23 and an additional \$1.1 million in expenditure reductions in 2023-24. However, the district projects a deficit of \$1.2 million in fiscal year 2023-24. The district's FSP identifies revenue increases in 2022-23 for a joint occupancy agreement; however, this item is contingent on external factors and cannot be guaranteed.
2. During this review period, the district approved two MOUs with ITA and one MOU with CalPro at the April 21, 2021 board meeting. The district completed the required AB 1200 disclosures showing the cost of the agreements in 2020-21, but none of the MOUs had an impact on the district's multiyear financials.
3. The district reached a tentative agreement with ITA on December 14, 2021 which ITA ratified on January 28, 2022. The agreement was scheduled to be placed on the February 16, 2022 board agenda for possible approval. The agreement made changes to various articles and revised the term of the contract to July 1, 2021 through June 30, 2024. The tentative agreement included a restructure of the certificated salary schedule, retroactive to July 1, 2021, which equates to an overall 6% increase and provides a 4% increase to the salary schedule effective July 1, 2022. The AB 1200 disclosure outlining the cost of the agreement and the impact on the district's multiyear financial projections had not yet been completed at the time of FCMAT's fieldwork, and FCMAT was unable to determine whether the district considered the impact of the agreement on its MYFP before reaching agreement.

### Recommendations for Recovery

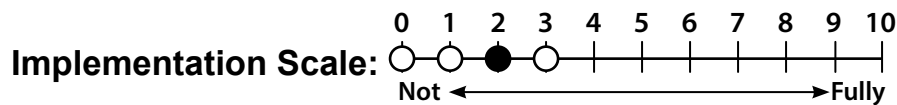
1. The district should ensure that multiyear projections are adequately supported with ongoing revenue enhancements and/or expenditure reductions that are sustainable.
2. Cost analyses and multiyear financial projections should be prepared for use in decision-making when an expenditure commitment is contemplated, including salary and benefit enhancements negotiated through the collective bargaining process.



3. The district should include a clear and detailed list of assumptions and a detailed narrative for the MYFP at each reporting period and include that information in its budget presentation materials. These should integrate the budget, FSP, excluding those items that are contingent on external factors, and the LCAP into the MYFP.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 14.1 Impact of Collective Bargaining

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### Legal Standard

Public disclosure requirements are met, including the costs associated with a tentative collective bargaining agreement before it becomes binding on the LEA or county office of education. (GC 3547.5 (b))

### Findings

1. Before a public-school employer enters into a written agreement with an exclusive representative, GC 3547.5(a) requires the major provisions, including costs for the current and subsequent years, to be disclosed at a public meeting in a format prescribed by the superintendent of public instruction. GC 3547.5(b) requires the superintendent (in this case the county administrator) and CBO to certify in writing that the cost incurred under the proposed agreement can be supported financially. This certification must be prepared in accordance with Education Code Sections 42130 and 42131 and must itemize any budget revision(s) necessary to support the costs of the agreement in each year of its term.

GC 3540.2 provides for the added oversight of collective bargaining. It requires that a district with a qualified or negative budget certification pursuant to EC 42131 allow the county office of education at least 10 working days to review and comment on any proposed agreement between the exclusive representative and the public school employer before it is ratified by the board. While this requirement is set in statute, LACOE requires all districts within the county to submit all public disclosure forms to the county office for review at least 10 working days prior to the date the governing board will take action, as stated in its Informational Bulletin No. 5405 dated July 16, 2021. The bulletin also states that a “Public Disclosure form must be prepared for all agreements, including those for no increase or a decrease in compensation,” which suggests that any tentative agreement and/or MOU should comply with the public disclosure requirements.

2. The district’s employees are represented by the following bargaining unit:
  - The ITA represents certificated employees such as teachers, special project coordinators, librarians, counselors and nurses. (ITA successfully petitioned to represent the adult education teachers, and ITA settlements have included adult education teachers since 2016-17.)
3. The district received notification from CalPro, otherwise known as Painters and Allied Trades, in a letter sent via email dated October 4, 2021, stating that effective immediately, it would no longer represent the Inglewood classified employees. Additionally, the California Professional Employees contract expired on June 30, 2021. Due to the termination of representation, the classified employees will need to reestablish a new contract once an election is held to certify a new union. Interviews indicated that the election was scheduled for March 4, 2022.
4. The Inglewood Management Association (IMA) is an unrepresented employee group, who typically meets and confers with the county administrator monthly. Although



unrepresented employee groups or individuals are not collectively bargained with, settlements with these unrepresented groups and individuals are often the result of a “me too” clause and therefore have an associated cost for compensation and should be disclosed in the same manner as required under GC 3547.5(a). The need for public disclosure of all increases to salaries and benefits in an open and transparent manner is a vital function of the district.

5. The ITA contract expired June 30, 2021. During the May 12, 2021 board meeting, the district presented its initial proposal to maintain the provisions of the current collective bargaining agreement with ITA with modifications to various articles as stated in the district's initial proposal (see Standard 14.2 for additional details). The district's proposal was to add, modify or delete language in nine identified articles as well as extend the term of the agreement for three additional years.
6. On December 14, 2021, the district negotiated a tentative agreement that the ITA ratified on January 28, 2022. The agreement made numerous changes to various articles and revised the term of the contract to July 1, 2021 through June 30, 2024. The tentative agreement also included the restructure of the certificated salary schedule, retroactive to July 1, 2021, which is equivalent to an overall 6% increase. An additional 4% increase will be effective July 1, 2022. Interviews indicated that the district was completing the public disclosure document at the time of FCMAT's visit. The agreement and the revised salary schedule for teachers, counselors, psychologists, program specialists, and child development center teachers were scheduled to be placed on the February 16, 2022 board agenda.
7. FCMAT's review of board meeting minutes found two MOUs with ITA were approved on April 21, 2021. The first MOU addressed instruction for the reopening of schools during fiscal year 2020-21. This MOU provided bargaining unit members employed with the district between January 1, 2021 and June 30, 2021, a one-time stipend of \$600 to offset the increased costs associated with working remotely due to the COVID-19 pandemic. The second MOU addressed the in-person (hybrid) instruction model, which was to serve as a supplement to prior MOUs executed by both parties. The district completed an AB 1200 disclosure that was signed by the county administrator and CBO on April 16, 2021; however, the disclosure document only addressed the initial MOU with ITA regarding the reopening of school and the one-time \$600 stipend. The second MOU regarding the in-person (hybrid) instruction model was not addressed in the public disclosure. Although there is no expected fiscal impact with this MOU, a best practice (and county office direction) is to complete and present an AB 1200 public disclosure document to provide transparency to the county office and community.

During that same April 21, 2021 board meeting, the county administrator approved an MOU with CalPro concerning the COVID-19 pandemic. For unit members required to work on-site March 16, 2020 through April 17, 2020, this agreement included pay of 1.5 times the regular compensation per hour. Additionally, unit members required to work on-site February 1, 2021 through June 11, 2021 received hazardous pay of \$2 per hour. The district completed an AB 1200 disclosure that was signed by the county administrator and CBO on April 16, 2021.



The district completed an AB 1200 disclosure for the Inglewood Management Association and presented it during the April 21, 2021 board meeting. Per the disclosure board agenda description, the district negotiated a tentative agreement on March 30, 2021. FCMAT was not provided with a copy of this tentative agreement, and the wrong MOU was attached to the AB 1200 disclosure. However, according to the disclosure, confidential and management employees received a one-time \$600 stipend as compensation for the increased costs of working remotely as a direct result of the COVID-19 pandemic.

8. The county office responded to all three of the district's AB 1200 disclosures on April 21, 2021 and concluded that per the district's analysis and as reflected in the disclosure, the district will meet the minimum reserve requirements during the term of the agreements.

As stated in LACOE's Informational Bulletin, all public disclosures are required to be submitted by all districts within the county at least 10 working days prior to the date that the district will act. FCMAT's review of the disclosure forms show that the signature date of the district administration was April 16, 2021, which only gave the county office three working days to review and comment on the proposed agreements prior to county administrator/board action.

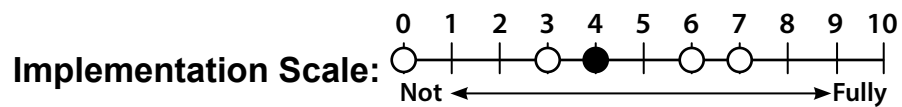
## **Recommendations for Recovery**

1. Once a school district loses local control, the county office of education is the oversight agency, with the concurrence of the SPI and the president of the State Board of Education. The county administrator's role and responsibilities are subject to the discretion of the county office, including the authorization to enter into binding agreements. Communication with the county office is also of vital importance during the AB 1200 process. The parameters of these roles, relationships and responsibilities should be clearly communicated to all bargaining units, particularly as it affects binding agreements.
2. The district should fulfill requirements regarding all collective bargaining agreements subject to public disclosure requirements articulated in GC 3547.5(a)-(b) and Education Code 42130-42131.
3. The district should prepare public disclosures, including MYFPs, for all agreements reached with employee bargaining units. The role of the district public disclosures as required by AB 1200 and AB 2756, including multiyear financial projections, for all agreements reached in accordance with GC sections listed above is of paramount importance.
4. Extra care should be taken to ensure that oversight agencies have the full 10-day period to review the filing for accuracy.
5. The district should continue to follow the GC 3547.5(a)-(b) disclosure requirements for unrepresented employee groups, such as IMA, and individuals.
6. All information provided in the AB 1200 public disclosure forms should be checked for accuracy before inclusion in the board agenda documentation.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	7
July 2018 Rating:	7
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 14.2 Impact of Collective Bargaining

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### Legal Standard

Bargaining proposals and negotiated settlements are “sunshined” in accordance with the law to allow public input and understanding of employee cost implications and, most importantly, the effects on the LEA’s students. (Government Code 3547, 3547.5)

### Findings

1. GC 3547(a) requires all initial proposals of exclusive representatives and the school district to be presented at a public meeting. Additionally, GC 3547(b) prohibits meeting and negotiating from taking place until a “reasonable time has elapsed after the submission of the proposal to enable the public to become informed and the public has the opportunity to express itself regarding the proposal at a meeting of the public school employer.” This section of the GC requires the district’s initial proposals to be adopted by the public employer after the public has had the opportunity to express itself, and any new subjects arising from negotiations after the initial proposals must be made public within 24 hours.
2. The district’s contract with ITA requires the association to notify the district of its intent to modify, amend, or terminate the collective bargaining agreement by presenting its initial proposal to the public during a board meeting no later than March 15 of the calendar year in which the agreement expires. A public hearing is to take place within two regular board meetings from the initial presentation for public comment. After the public hearing, the district is required to respond to the initial proposal within two regular board meetings.
3. FCMAT’s review of board agendas and minutes found that on May 12, 2021 the district held two public hearings allowing for public comment: one to sunshine ITA’s initial proposal, and one to sunshine the district’s initial proposal to ITA. ITA’s initial proposal, dated April 19, 2021, identified 16 articles including articles on compensation and fringe benefits. The district’s initial proposal identified nine articles, eight of which were also selected by ITA. The district’s initial proposal with ITA was approved during the same meeting after the public hearing was conducted.
4. The CalPro bargaining unit contract expired on June 30, 2021. As stated in Standard 14.1, the classified employees are no longer represented by CalPro. Once a determination has been made about which union the classified employees have selected, a new contract will need to be negotiated.

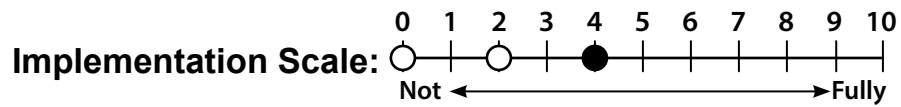
### Recommendations for Recovery

1. The district should ensure it sunshines all collective bargaining proposals and agreements subject to public disclosure requirements articulated in GC 3547 and 3547.5.
2. Any agreed-upon exceptions to contract terms and timelines should be memorialized in writing.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 14.3 Impact of Collective Bargaining

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### Professional Standard

The LEA has developed parameters and guidelines for collective bargaining that ensure that the collective bargaining agreement does not impede the efficiency of LEA operations. Management analyzes the collective bargaining agreements to identify any characteristics that impede effective delivery of LEA services. The LEA identifies those issues for consideration by the governing board. The governing board, in developing its guidelines for collective bargaining, considers the impact on LEA operations of current collective bargaining language, and proposes amendments to LEA language as appropriate to ensure effective and efficient service delivery. Governing board parameters are provided in a confidential environment, reflective of the obligations of a closed executive board session.

### Findings

1. To strive for organizational effectiveness and efficient service delivery, it is important to consider how collective bargaining language affects district operations and propose amendments to the language as appropriate. Effective administrations involve supervisory staff in discussions on potential contract modifications or eliminations of positions with bargaining units and unrepresented personnel. FCMAT's interviews indicated that district administration sought input to the collective bargaining process from principals and other management personnel during this review period.
2. To provide fiscal, employee management and program support, an effective bargaining team includes members who represent various perspectives and disciplines and are aware of characteristics in contracts that impede effective delivery of LEA services. This team approach allows multiple perspectives and differing opinions on how to modify agreements to best meet district goals and objectives.

The district's bargaining team consists of the chief HR officer, executive director of HR & risk management, CBO, CAO, COO, executive director of federal and state programs, one principal, and the district's legal counsel. Interviews indicated that the CBO has attended many negotiations meetings since his hiring in September 2020. Interviews also indicated that the district conducts weekly meetings with ITA and met biweekly with CalPro prior to the termination of representation. In addition, administration including district cabinet, principals and directors meet monthly to discuss various topics related to negotiations.

3. The district established a standing Health Insurance Committee, consisting of three representatives chosen by ITA, three representatives chosen by CalPro, and three representatives chosen by the district. The purpose of this advisory committee is to identify options for reducing health benefit cost increases. The district also works with a third-party benefits administrator, Burnham Benefits Insurance Services, to assist in this endeavor. The Health Insurance Committee continues to meet regularly and is considered a source of input in the negotiations process.



4. As discussed in Standard 14.1, the collective bargaining activity that occurred during this review period included a few MOUs, mostly related to the impacts of the COVID-19 pandemic. Additionally, a tentative agreement with ITA was reached on December 14, 2021 and ratified by its members on January 28, 2022.
5. A review of board agendas showed that confidential discussions on negotiations are listed in the blanket statement for closed-session meetings; however, only the January 12, 2022 board minutes for closed session show an update regarding negotiations with ITA.

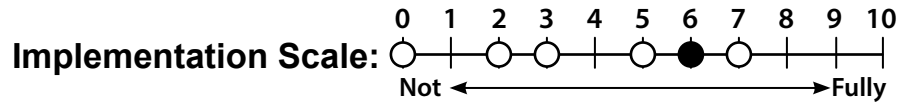
## **Recommendations for Recovery**

1. The input process for developing initial proposals before they are presented at a public hearing should continue to be inclusive in identifying characteristics in contract language to ensure effective delivery of district services and meet the needs of all schools.
2. The district should evaluate decisions and their multiyear impact on all collective bargaining agreements as well as any memoranda of understanding.
3. The district should continue to formally communicate and train managers regarding the impact of all contract modifications. District administration should issue a joint statement in conjunction with bargaining units on the impact of a given settlement on its employees. If a joint statement is not possible, a formal district announcement, recapping the major impacts of the settlement would help increase communication and understanding.
4. The district administration should monitor the actions of the advisory Health Insurance Committee to ensure there is no adverse impact to the district.
5. The district should continue to ensure that the CBO is a member of all its collective bargaining teams and ensure that the CBO attends all collective bargaining sessions.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	6





## 15.2 Management Information Systems

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### Professional Standard

Management information systems support users with information that is relevant, timely and accurate. Assessments are performed to ensure that users are involved in defining needs, developing specifications, and selecting appropriate systems. LEA standards are imposed to ensure the maintainability, compatibility, and supportability of the various systems. The LEA ensures that all systems are SACS-compliant, and are compatible with county systems with which they must interface.

### Findings

1. The district created a DTAC several years ago to guide the district in its use and selection of technology. The executive director of IT led the DTAC meetings, and committee members included lead technology teachers, principals, cabinet members, department leads, and senior IT staff. Meeting agendas, minutes, and other related materials were distributed via email to all committee members. On January 26, 2022 the board approved a realignment and reorganization of technology support. The executive director of IT will now report to the CBO instead of the CAO. Along with the executive director, other IT staff transferred to the business office, which includes those who are responsible for network infrastructure, CALPADS processing and Aeries attendance/enrollment/class scheduling. A newly created position of director of educational technology will report to the CAO. Reporting to the director of educational technology will be all site-based and district office-based computer technicians. When the IT Department was originally transferred from the Business Services Department to the Educational Services Department in March 2020, the executive director of IT was reassigned to report to the CAO instead of the CBO. Shortly after this reassignment, the DTAC meetings ceased and were replaced by new ITC meetings led by the CAO. The new ITC has a strong instructional emphasis and departments outside of Educational Services no longer participate. With the loss of the DTAC, the district has lost the regularly scheduled technology advisory committee meetings with the emphasis on districtwide, two-way communications between departments.
2. The executive director of IT routinely attends LCAP planning meetings where technology use, as noted in the plan, is discussed. These meetings have helped the Educational Services and IT staff to better understand how they can work together to improve.
3. The district hired a 1 FTE database administrator during the 2016-17 fiscal year to provide data integration support and primary support for CALPADS processing and reporting. The database administrator made notable progress in automating data transfers between HRS, Aeries, and Nutrikids and eTriton child nutrition systems, and improved the error reconciliation reporting, which resulted in a significant decrease in manual tasks previously required for compiling and reporting CALPADS data. The automated process also increased the probability of CALPADS data accuracy because the potential for human error had been reduced and improved data verification processes had been implemented.



In September 2020 the database administrator resigned, and the position remained vacant until it was filled in June 2021.

While the database administrator position was vacant, the district approved a contract with the former database administrator to provide support for processing CALPADS data beginning October 1, 2020 to December 31, 2020. This contract was amended on February 17, 2021 to extend the term to March 31, 2021 and increase the amount to \$40,400 and amended again on April 21, 2021 to continue CALPADS support through June 30, 2021 for an additional \$15,040. On June 30, 2021, the district approved another contract with the consultant for \$25,000 to provide support for CALPADS reporting from July 1, 2021 through October 31, 2021. The contract was amended on November 3, 2021 to extend the term through June 30, 2022 and increase the amount to \$50,000.

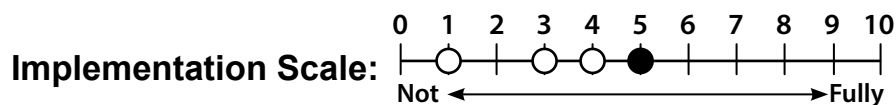
4. The district uses financial management software provided by LACOE that complies with SACS for uniform statewide financial reporting.

## Recommendation for Recovery

1. The district should reinstate the DTAC meetings to ensure that all parties have an opportunity to speak, listen, learn, and guide the use of technology. The ITC meetings should continue as needed.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	3
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	5





## 15.3 Management Information Systems

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### Professional Standard

Automated systems are used to improve accuracy, timeliness, and efficiency of financial and reporting systems. Needs assessments are performed to determine what systems are candidates for automation, whether standard hardware and software systems are available to meet the need, and whether or not the LEA would benefit. Automated financial systems provide accurate, timely, and relevant information that conform to all accounting standards. The systems are designed to serve all of the various users inside and outside the LEA. Employees receive appropriate training and supervision in system operation. Appropriate internal controls are instituted and reviewed periodically.

### Findings

1. A CALPADS processing team consisting of the database administrator, the application support technician (a computer technician who was working out of class at the time of FCMAT's fieldwork), select staff from the business office, and the executive director of IT are responsible for CALPADS reporting.
2. The district provided FCMAT with a document titled CALPADS Process and Procedures for IUSD. The document states the following:

Purpose: This plan provides direction for IUSD's preparation for all CALPADS submissions throughout the school year, defining scope, roles and responsibilities, calendar and timeline, and alignment to FCMAT findings and recommendations.

This 41-page document is much improved over the draft version of the same document received during the last review. This latest version contains, among other new details, timelines and areas of responsibilities for data collection and review. The document is a sound foundation on documenting the district's CALPADS processes and accountability.

3. The district still lacks a comprehensive professional development plan for many of its information systems. FCMAT was provided a document titled Inglewood Unified School District Technology Plan 2020-2024, Implementation Plan. This plan has not yet been county administrator/board approved but updates on the plan were presented to the board on March 10, 2021 and again on August 25, 2021. The document is instructioncentric, but includes plans for individual assessment of employees to determine appropriate technology integration training.
4. School site principals have online access to their site budgets through the PeopleSoft financial system and 1-on-1 training in running and interpreting budget reports is available from staff in the business office, if requested. The business office no longer emails principals their budget monthly in a simplified format via an Access system, instead it sends the PeopleSoft budget reports monthly. In addition, the business office has monthly meetings with principals to review their budgets, answer questions, and provide training as necessary. These meetings are well-received by the principals. The combination of these methods provides principals multiple avenues to receive up-to-date budget information.



5. Correction of errors in the position control system continues to be a focus of both the Business Services and HR departments during this review period. As in previous years, current efforts include identifying and eliminating those open and budgeted positions, which have not or will not be filled. In prior years, HR staff attended position control training provided by the county office to help better understand how the system is used for salary and benefit budget projections; however, during this review period a limited training was provided to the departments by their respective department leader in specific areas of the system. There appears to be a lack of understanding about how a change in the HR data fields of position control can affect payroll and accounting.
6. In fall 2017, the district implemented the Informed K12 system, which, among other things, is used for the creation, routing, and approval of personnel action forms. This system has been designed to ensure that any changes to position assignments are monitored and, where needed, updated in the position control system. The current process includes nine steps to fill a position in the system. HR and Business staff reported that they are pleased with how the Informed K12 system is used to process and track information needed to update position control.
7. The annual audit of the district, performed by Nigro and Nigro for the fiscal year ended June 30, 2021, found the following exception and recommendation.

Finding 2021-007: Information Technology (30000)

**Criteria:** The District should maintain proper policies and procedures which ensure the integrity and safe keeping of all information databases utilized by District.

**Condition:** During inquiry of information technology procedures as well as walk through of controls, the following deficiencies were noted:

- There are no procedures to require staffing passwords to change at least annually to ensure the safe-keeping and integrity of information systems utilized by the District.
- There are no procedures to change the security door passcode at least annually.
- During our walk-through of controls, we identified seven instances in which former District employees' access to vital information systems was not removed in a timely manner from their final work day. These individuals' access was active for a range of 195 days to 794 days after their final workday.

**Cause:** The District lacks written procedures and implementation of such procedures to ensure all access is revoked in a timely manner.

**Effect:** Leaving such access can potentially result in a compromising vital financial information.



**Recommendation:** We recommend that the District develop written procedures and implement such procedures to ensure that there is proper communication from human resources and information technology of employees' final workday. The Information Technology (IT) Department needs to implement procedures to remove access and keep a tracking mechanism so that an internal audit can be conducted to ensure procedures are being followed.

**Views of Responsible Officials:** The District will ensure to revise current procedure manuals related to revocation of access to District technology systems, in a timely manner. The tracking mechanisms will be enhanced to ensure accurate reflection of termination of access. The Information Technology Department will collaborate with the Human Resources Department to track when employees access should be removed. Forms and procedures will be enhanced to ensure that sensitive information is not compromised.

## **Recommendations for Recovery**

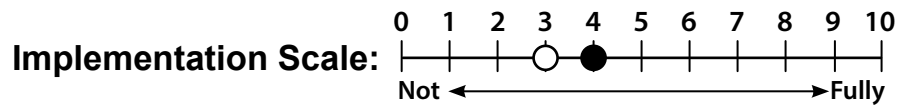
1. The district should continue to use the document titled CALPADS Process and Procedures for IUSD, updating it as necessary to reflect changes in both internal procedures and external processing requirements.
2. A complete skills assessment of administrators, teachers and support staff should be performed to better use the information systems used by the district. The process for doing so is documented in the Inglewood Unified School District Technology Plan 2020-2024. The district should complete this plan and submit it to the county administrator/board for approval. The district should assign district staff, coordinate with the county office, and/or arrange for qualified consultants to regularly provide professional development. The schedule and location of trainings should be posted on the district website, and sign-in sheets for employees who have attended the trainings should be maintained.
3. Resources in the business and HR offices should continue to be focused on correcting errors in position control and keeping information in the system up-to-date to ensure accurate and efficient payroll generation and budget data. Ongoing efforts to maintain data integrity will require a high-level of coordination between the HR and business offices. Meetings between the two departments to address problems and suggest resolutions should be held on a regular and scheduled basis. Staff who use the position control system should be assessed for their knowledge of the system and provided training if needed.
4. The district should develop and implement written procedures to ensure HR communicates with IT when an employee separates from employment and IT should remove that employee's access from district systems.
5. The district should develop and implement procedures requiring staff to change passwords at least annually.



6. The district should develop and implement procedures to change the security door passcode at least annually.

### Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 15.7 Management Information Systems

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### Professional Standard

Hardware and software purchases conform to existing technology standards. Standards for network equipment, servers, computers, copiers, printers, fax machines, and all other technology assets are defined and enforced to increase standardization and decrease support costs.

Requisitions that contain hardware or software items are forwarded to the Technology Department for approval before being converted to purchase orders. Requisitions for nonstandard technology items are approved by the information management and technology department(s) unless the user is informed that LEA support for nonstandard items will not be available.

### Findings

1. Before the IT Department was transferred to the Educational Services Department in 2020, the DTAC had been meeting and reviewing hardware and software standards, which were set by mutual agreement of the executive director of IT, principals, Educational Services Department leadership, and teachers knowledgeable about classroom technology use. Standards for computer hardware were reviewed only when the existing standardized computer was no longer available from the manufacturer, or special pricing was no longer available. Since the DTAC was replaced by the ITC shortly after the executive director of IT joined the Educational Services Department, the DTAC has no longer met. Instead, informal discussions among IT staff, instructional staff, and discussions with the ITC have been used to maintain the district's technology standards.
2. Hardware standards exist for different types of equipment to be used by administrators, teachers, and students and were published on the district's online Administrative Handbook. They are now published on the district's IT webpage ([https://www.inglewoodusd.com/apps/pages/index.jsp?uREC\\_ID=1471731&type=d&pREC\\_ID=1650148](https://www.inglewoodusd.com/apps/pages/index.jsp?uREC_ID=1471731&type=d&pREC_ID=1650148)) through a link labeled IT Procedures Manual (version 2021.01.13), which the IT Department has created. For security purposes, one must first sign into the district's Google platform to access the document. This document contains, along with other useful information, how to access quotes for both standard and nonstandard hardware items. Copier standards have also been developed because these devices also serve as fax machines, scanners, and printers. The IT Department has internal documentation on preferences for copiers and replacement network equipment including servers.

The districtwide use of the online Administrative Handbook has ceased over the past three years, and instead, departments populate their respective webpages with the handbook content instead. This is inconvenient for site users who may not be sure which department has the needed information since they may have to search various departments' webpages. It was simpler for users to search a centralized source of information such as the online Administrative Handbook.



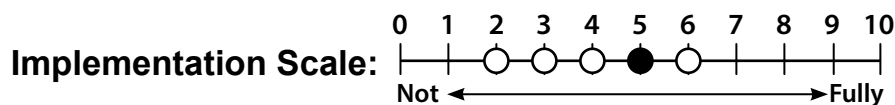
3. The use of the PeopleSoft financial system for routing technology purchase requisitions for approval has continued to allow the executive director of IT to review all technology purchase requests to ensure conformity. Working together the business office and IT Department have ensured that all requests for technology acquisition are routed through the PeopleSoft system. Requests for nonstandard equipment are made through the IT work order system so that requests and communication between both parties can be documented and processed.

## Recommendations for Recovery

1. The DTAC should be reinstated, and, along with the ITC members should regularly work together to formally review and set standards as necessary for both software and hardware.
2. The district should publish a complete list of technology standards for equipment used by administrators, teachers, and students in a centralized online source, such as the Administrative Handbook.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 15.8 Management Information Systems

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### Professional Standard

An updated inventory includes item specification for use in establishing standards for an equipment replacement cycle and rotating out obsolete equipment. Computers and peripheral hardware are replaced based on a schedule. Hardware specifications are evaluated yearly. Corroborating data from work order or help desk system logs is used when this data is available to determine what equipment is most costly to own based on support issues. The total cost of ownership is considered in purchasing decisions.

### Findings

1. The district continues to lack a formalized lifecycle replacement plan for critical network infrastructure equipment such as routers, switches, wireless access points, telecommunications electronics, servers, and data storage. The executive director of IT has created a spreadsheet showing critical systems that need replacement with some equipment more than 10 years old and no longer supported by the original vendor. The lack of formal planning will create unplanned expenses and outages when systems cease to function. Technology assets eventually fail, and their replacement schedules should be monitored so the associated expenses can be properly budgeted.
2. The IT Department has used the School Dude Help Desk system since fall 2016. All district employees can submit tickets through this system. The computer technicians are assigned to specific regions, and the system automatically assigns the ticket based on the location of the services requested. Interviews with staff indicated that approximately 75% (similar to the last review period) of all service requests are now processed through the help desk system. Because of the increased volume, not all service requests are formalized and entered in the School Dude Help Desk system.
3. To bring the district's actual inventory of items up to date, on February 17, 2021 the county administrator approved a contract with CBIZ Valuation Group, LLC beginning February 18, 2021 and terminating June 30, 2021. The scope of the contract generally details completing an inventory of district assets as defined in the contract under Exhibit A. Approximately 7,587 items were inventoried by CBIZ and can be reviewed in an Excel spreadsheet. Unfortunately, the district has not maintained the newly created inventory or reconciled it against the previous inventory records.
4. In August 2017, the IT Department purchased mobile device management and inventory tools for phones and tablets from School Dude. The department also purchased Insight from the same vendor partly to aid in inventory reconciliation. The Insight product can scan the network and record information on the type of devices it locates. The IT Department has implemented the School Dude Insight module. Reconciliation between School Dude's Asset Management system and the Insight module is being done to determine what assets have been found that were not recorded in the asset management system. Additional information regarding the physical inventory is contained in Standard 16.1.



5. The warehouse clerk position was eliminated several years ago, and the tagging/inventory function performed by this position is no longer performed at the warehouse. Individual departments are responsible for tagging assets for their respective departments. During the previous reporting period, the district had identified another staff position, the inventory and distribution coordinator, who would assume tagging and inventory management duties. This employee will need significant training to successfully complete these additional responsibilities, but has not received any training to accomplish these tasks.
6. As reported in prior review periods, the warehouse does not receive all technology equipment since most shipments are delivered directly to the departments and school sites. Both standards-based equipment such as laptops, Chromebooks and other devices, and nonstandard-based equipment such as special orders, are purchased from the district's list of value-added resellers (VARs). When equipment is ordered from the VARs, the vendor tags the items prior to shipping and provides the district with an electronic data file containing information such as make, model, serial number, and asset tag number. For all other vendors, the district should have a policy that requires all technology equipment and any other fixed assets to be delivered directly to the district's warehouse. The IT Department has an asset tagging procedure for assets purchased from an existing VAR, but it does not include guidelines for tagging equipment delivered to the central warehouse.

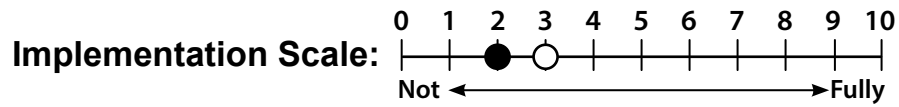
## **Recommendations for Recovery**

1. The district should formalize its strategic vision and planning for the use of the networking infrastructure equipment such as routers, switches, wireless access points, telecommunication electronics, servers, and data storage to adequately prepare for ongoing expenses needed to keep the system functioning properly. To help ensure funding for future upgrades, the district should formalize and approve a lifecycle replacement plan that is represented in its multiyear budget.
2. The district should ensure that all IT service requests are processed through the help desk system.
3. The district should adequately train staff to maintain the inventory of fixed assets and to incorporate the newly acquired inventory data from CBIZ into the School Dude Asset Management system.
4. The district should have a policy/procedure that requires all technology equipment, except for items ordered through the list of VARs, and any other fixed assets to be delivered directly to the district's warehouse to ensure that all fixed assets are properly received and tagged for inventory purposes.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 15.10 Management Information Systems

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### Professional Standard

In order to meet the requirements of both online learning and online student performance assessments, the district has documentation that provides adequate technology to support these needs. Documentation should include sufficient bandwidth to each school site, internal local network infrastructure capacity, electronic devices which meet the published minimum standards for online student assessments, and an adequate number of devices to allow testing of all students within the prescribed amount of time.

### Findings

1. The district uses Chromebooks to administer the Smarter Balanced Assessment tests and is generally pleased with their use and performance. However, testing was waived during the 2020-21 school year due to the COVID-19 pandemic, and the testing window for California schools for 2021-22 is January 11 through July 15, 2022. At the time of fieldwork, testing for the current school year had not yet been administered. The district has prepared for on-site testing to resume at the sites by improving network performance with enhanced wireless access, increasing bandwidth to sites, and improving reliability with the completion of fiber connectivity to all school sites.
2. The executive director of IT reports to the CBO and attends all principals' meetings.
3. The district bandwidth of 10 Gbps to each school site, provided by fiber connectivity, is sufficient, and the impact of assessment testing on the district's bandwidth to the internet is minimal with a 10 Gbps internet connection to the county office. LACOE is the district's internet service provider.

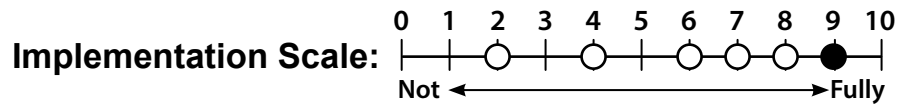
### Recommendation for Recovery

1. The executive director of IT and the newly created director of educational technology should meet regularly with Educational Services Department staff and attend principals' meetings to understand the district's educational goals and align human and fiscal resources to support those goals. The executive director of IT should also meet regularly with the CBO and appropriate business office staff to discuss issues related to the Business Services Department's technology goals and the financial resources available for technology.



## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	6
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	7
July 2018 Rating:	8
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	9





## 15.11 Management Information Systems

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### Professional Standard

The LEA optimizes funding of various types of technology throughout the organization by effective utilization of available Federal E-rate discounts, the California Teleconnect fund, and other available discount programs and funding sources to reduce costs for various technology expenditures.

### Findings

1. The executive director of IT is the primary position responsible for the E-Rate process and works closely with the CBO and the district's E-Rate consultant to ensure timeliness and compliance with the application process.
2. Beginning in the 2009-10 fiscal year, the district used an independent consultant to provide E-Rate consulting services and prepare district claims. During the 2018-19 fiscal year, the district established a new contract with Infinity Communications and Consulting to provide these services.
3. The district still does not have a specific committee to hold annual E-Rate planning meetings with representatives from key departments including Business, IT, Facilities, Food Services and Educational Services. The purpose of these meetings should be to assess the district's needs and budget for equipment and services that may be partially funded through the E-Rate process. However, the establishment of a DTAC in 2018-19 provided the basis for such discussions. Minutes from the December 11, 2018 DTAC meeting show that E-Rate usage and qualification were discussed. When the IT Department was transferred from the Business Services Department to Educational Services, the DTAC meetings stopped and were replaced with an instruction-focused ITC. Since this occurrence, the executive director of IT meets individually with leaders of various departments such as Business and Facilities to ensure that needs of these departments are addressed through E-Rate where appropriate.
4. The district applied for California Teleconnect Fund (CTF) discounts on March 10, 1998 and was approved on July 21, 1999. The executive director of IT stated that as part of the district's switch to Infinity Communications and Consulting for E-Rate assistance, the vendor performed an audit of eligible CTF accounts and determined that the district is receiving CTF discounts on all eligible services.
5. The district's 2021 E-Rate Form 471, submitted on March 19, 2021 states that the percentage of students in the district eligible for the National School Lunch Program (NSLP) is 83%, which qualifies the district for an 85% discount on eligible hardware (also known as Category 2 funding) and a 90% discount on eligible internet and data communication services (also known as Category 1 funding). The district's eligibility percentage for free and reduced-price meals is near threshold levels of E-Rate funding.



6. For the 2021 funding year, which runs from July 1, 2021 to June 30, 2022, the district filed a Form 470 for districtwide internet service and data transport circuits. A total of \$379,927.84 was committed to the district for the 2021 funding year by the E-Rate program.
7. On April 1, 2020, the Universal Service Administrative Company (USAC), acting on behalf of the Universal Service Fund who oversees the E-Rate program at the federal level, sent a Recovery of Improperly Disbursed Funds Letter informing the district of USAC's decision to recover E-Rate funds, which they had distributed during the 2015-16 year. The district then received a First Demand Payment Letter dated December 15, 2020 from USAC, the demand was for \$84,379.68. According to USAC, this was because the district erroneously claimed more sites for replacement networking equipment than were eligible during the 2015-16 year. The district had been funded for the larger amount, but during an audit performed by USAC in 2020, it was determined those sites were ineligible for funding under the rules and regulations, which is why the demand was made for a refund of prior payment. On September 1, 2020 the district's current E-Rate consultant appealed the demand stating that many sites were eligible. USAC agreed with the E-Rate consultant's appeal, and in a letter dated October 15, 2020, reduced the amount owed by \$23,798.11 for a total of \$60,581.57. On April 16, 2021, the district made a \$60,581.57 payment to USAC to settle the matter. The district acted correctly in appealing USAC's decision on the funds owed for the 2015-16 funding year and was able to reduce the amount owed by approximately 25%.

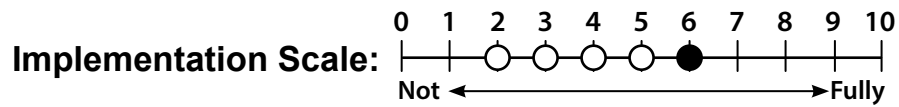
## **Recommendations for Recovery**

1. The district should continue to use an outside consultant to provide E-Rate consulting services and prepare district claims.
2. The district should ensure that the executive director of IT discusses in detail with appropriate district leadership the use of E-Rate discounts and timelines. If they cannot perform this function, the district should form an E-Rate committee, which should meet each year in the late summer/early fall to discuss the upcoming E-Rate timeline and potential funding opportunities, and to review existing E-Rate discounts to determine if they will be reapplied for in the following year.
3. During the year, key individuals such as those from the Business, IT, Facilities, Food Services and Educational Services departments should meet regularly to better understand the availability of E-Rate discounts and possible funding levels. The district should continue to verify its E-Rate funding levels and have contingency plans for both the amount funded and those deferred on E-Rate applications.
4. District staff should monitor the vendor invoices for the expected E-Rate and California Teleconnect Fund discounts for eligible services. If expected discounts or credits are not appearing on eligible invoices, the district should immediately contact its E-Rate consulting company to address this issue.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 16.1 Maintenance and Operations Fiscal Controls

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### Legal Standard

Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.

### Findings

1. On April 15, 2015, the state trustee approved the services of a vendor to perform a fixed asset inventory and asset management services, which included barcode tagging, asset exception reporting and providing certified appraisal reports. A physical inventory and tagging generated a fixed asset report published June 30, 2015. During the current and prior review periods, district staff could not provide an additions/deletions list for assets that were obtained or disposed of since the completion of the June 30, 2015 report.

On June 22, 2017, the state administrator approved an agreement for School Dude to provide a cloud-based application for asset management services. On June 26, 2019, this contract was renewed. No documentation was provided to indicate that the contract was renewed for the 2020-21 or 2021-22 fiscal years. At the time of FCMAT's fieldwork, staff could not provide an inventory list generated by this system.

On February 17, 2021, the county administrator approved an agreement with another vendor to perform a capital asset inventory and valuation, barcode tagging, and limited reconciliation to the district's existing fixed asset list. The vendor provided summary and detailed fixed asset reports along with additions and disposals reports and a fixed asset log in Excel. However, the district did not use the reports to complete Form Asset for its 2020-21 unaudited actuals. Interviews indicated that the reconciliation of work in progress category of assets has not been completed. On June 30, 2021, the county administrator approved a supplemental services agreement with the vendor to reconcile the construction in progress account.

2. The district's 2020-21 independent audit report was presented to the county administrator/board on January 26, 2022. The report includes findings concerning lack of accuracy in recording capital assets and reporting deficiencies. The findings indicate that the district does not maintain adequate source records to support the amount reported as capital assets and related accumulated depreciation in its financial statements. The district does not have controls to ensure that additions, disposals, and depreciation are recorded accurately; therefore, the increases and decreases to capital assets reported on its financial statements could not be substantiated. Additionally, the district recorded capital outlay expenditures in the general ledger yet reported no increases to capital assets on its financial statement.

Findings included in the last several annual audit reports include material weaknesses specifically related to inventory and fixed assets. The recommendations have not been implemented, and these findings contributed to the qualified opinion given by the independent auditor on the 2020-21 audit report.



3. The Purchasing Department SOP states that all equipment valued at more than \$500 should be delivered to the warehouse, where it will be tagged, inventoried, and tracked. If equipment must be delivered to the site, warehouse staff is supposed to tag the merchandise at the site; however, interviews with staff indicated that assets delivered directly to the sites have not been regularly tagged. The district continues not to tag donated or non-technology items, and no evidence indicates that additions and deletions are tracked. The district has not established sufficient receiving procedures and protocols when physical inventory items and/or textbooks are shipped directly to school sites. Interviews with staff indicated they are unaware of the procedures and their responsibilities.

The IT and Food Services departments have developed some basic departmental tagging procedures. The Food Services and IT departments receive tags from the warehouse and tag their own assets, and most technology items are tagged by vendors prior to delivery to the district (see Standard 15.8).

4. Several years ago, the warehouse clerk was responsible for tracking items; recording them in a spreadsheet, noting the description, location, serial number, funding information and tag number; and applying the asset tag. However, the state administrator eliminated that position at the April 11, 2018 board meeting, and the inventory listing has not been maintained. On June 29, 2020, the county administrator approved the creation of the new position of distribution and inventory coordinator. Among other duties, this position is responsible for managing the inventory database, updating and tracking district inventory including capital assets and textbooks. Interviews indicated that the distribution and inventory coordinator has no access to the warehouse clerk's 2015-16, 2016-17 or 2017-18 inventory lists. The district has not implemented a system for asset management nor has the distribution and inventory coordinator received training on asset management.
5. The sale of surplus property is governed by BP 3270 as well as Education Code Sections 35168, 17540-17542, and 17545-17555, which establish safeguards to account for and protect district-owned property. The Education Code requires a specific detailed process for disposing of surplus assets and using those sale proceeds. The district salvage procedures in the Purchasing Department SOP do not support the reporting requirements in Education Code 35168, requiring inventory to be tracked as to the time and mode of disposal. It also does not provide proper internal control, possibly allowing valuable items to be disposed of without proper review.
6. FCMAT could not identify the employee or department responsible for overseeing the disposition of district surplus items. Because of frequent staff turnover, it is unclear if employees follow all the district salvage policies and procedures and whether they are knowledgeable of board-adopted policies or the related Education Code sections. This could make implementation of BP and AR 3270 problematic, particularly the portion related to the salvaging of property valued at less than \$2,500 because internal controls to determine market value have not been implemented, and the property may be disposed of by dumping if someone erroneously determines it is of limited value. Personnel may not know about the regulations regarding disposal of assets and may try to trade in or sell items to a private party.
7. The district has forms for salvage of equipment items and for the collection of discarded books and materials that school sites may use to document obsolete inventory. Forms



supporting county administrator/board action show that school sites and departments use the salvage form, but it is frequently not fully completed. Additionally, the information is not used as documentation to support the items sold to salvage or to update the fixed asset list. Many of the forms reviewed were missing serial numbers and/or fixed asset tag numbers.

Under the current system, once the county administrator/board approves an item as surplus, it is stored until disposal. However, a surplus inventory list is not maintained. There are no physical controls or procedures to identify the items declared surplus that are not sold to salvage. There are also no procedures to identify if assets are transferred from the site of original purchase and/or delivery.

8. During the current review period, lists of surplus items, including eight vehicles, food service equipment, miscellaneous items from school sites and textbooks were declared surplus. The district provided copies of checks and deposit backup, which FCMAT matched to the general ledger; however, the backup did not include sufficient information about the items sold/salvaged/recycled. Therefore, it could not be determined if the proceeds were deposited to the correct fund.
9. Education Code Sections 60510-60530 and 17547 establish safeguards to account for and protect district instructional materials and their funding, which require a specific detailed process for the disposal and the use of the proceeds. In addition, the federal Office of Management and Budget (OMB) Circular A-110 states that any funds received for disposal of equipment that was purchased with federal funds must be returned to the original funding source.

The funding source column was left blank on many of the Salvage Inventory Sheets used for board backup, so it is unclear if the items are tracked correctly in the surplus inventory or at disposal and if all funds generated are deposited back to the original funding source. For example, food service funds were used to purchase a vehicle that was declared surplus; however, the originating funding source was not recorded on the Salvage Inventory Sheet. Several Salvage Inventory Sheets listed “general/categorical” as the funding source. All the funds generated because of the disposal of surplus items in the last 12-month period were deposited to the unrestricted general fund.

10. The county administrator approved service agreements with TLC Auctions at the March 10, 2021 board meeting for the 2020-21 fiscal year and at the November 3, 2021 board meeting for the 2021-22 fiscal year. This is the only surplus property disposal vendor approved for the 2020-21 and 2021-22 fiscal years. At the time of FCMAT’s fieldwork, the district had made two deposits totaling \$2,893 because of the disposal of obsolete and surplus items over the last 12-month period.
11. School sites reported they each have their own textbook inventory list, and textbooks sometimes come to the sites with asset tags, but not in all cases. The former textbook clerk left the district several years ago, and the textbook inventory has not been maintained since she left. Some books are located at the school sites, and some are located at the district office, but the district does not maintain a complete textbook inventory including the location of the books. Interviews indicated that if a site requests books, and the



distribution and inventory coordinator cannot locate the books at the district office, he will call the other sites to check for unused books.

The district uses a textbook inventory tracking software, but it is not fully implemented. Staff reported that one person from each school site received training on the system, but not all sites are using it. School sites submit a salvage form for obsolete textbooks for inclusion on the board agenda, and after county administrator/board approval, textbooks are picked up from the sites for disposal. However, there is no procedure to remove the books from inventory.

## **Recommendations for Recovery**

1. The district should conduct a physical inventory at least every two years and ensure all capital assets valued at more than \$10,000 (BP 3400) and other assets valued \$500 to \$9,999 are fully accounted for in the inventory ledger. In addition, Title 2 of the Code of Federal Regulations, Part 200 requires that equipment acquired with federal funds be included in the inventory if the acquisition cost exceeds \$5,000. Because the perpetual inventory has not been maintained since the 2021 physical inventory was conducted, the district should consider an annual inventory until roles and responsibilities are assigned. An exception list should be generated to support internal controls.
2. The independent appraisal company should be provided with a complete list of disposed assets and lost/stolen items for independent verification.
3. All assets valued at \$500 or more, including those donated, should be tagged. This should not be limited to purchased technology equipment. Individuals responsible for tagging should be clearly identified and trained in these job duties, or the individual who tags some of the items should be assigned to tag all of them. Tagging should be done in a timely manner to discourage theft.
4. All furniture, equipment and vehicle purchases should be added to the fixed asset inventory. All items declared surplus and disposed of should be deducted from the fixed asset inventory. All inventory lists, including the surplus inventory list, should be maintained and periodically reviewed for accuracy and completeness.
5. Receiving procedures for textbooks and physical inventory items that are shipped directly to school sites should be developed and distributed.
6. An employee should be assigned to maintain the fixed asset inventory management system. All individuals involved in asset identification, reporting and tagging should be properly trained. Staff should be cross-trained in tagging procedures and database management.
7. The auditor recommendations for compliance with internal controls for inventory, fixed assets and disposal of assets should be implemented.
8. School sites and departments should use and properly complete the Salvage Inventory



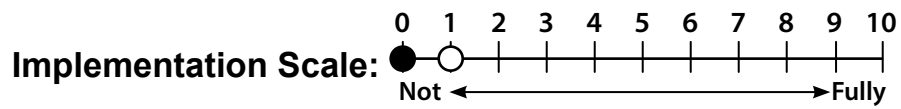
Sheet to document obsolete inventory as well as lost or stolen items; the completed form should be sent to the district office.

9. The Purchasing Department SOP and district salvage procedures should be updated to provide staff with comprehensive guidance regarding surplus assets and instructional materials. Focus should be placed on returning funds to any categorical sources that procured the asset in accordance with Education Code and federal requirements.
10. District management, sites and staff involved with the disposition of district surplus items should be trained in the execution of Administrative Regulation 3270, the Education Code and the best practices as it relates to the chain of custody regarding salvage policies and procedures.
11. The processing and disposal of surplus assets and instructional materials should be centralized. District-approved disposal firms should have their agreement and terms approved by the county administrator/board prior to disposal of district assets. Only firms approved by the county administrator/board should be used since it was reported that some firms have paid cash for surplus items in the past.
12. The final disposal of all assets, including vehicles, should be documented. All surplus vehicles should be disposed of by a district office staff member who is knowledgeable of administrative regulations regarding the disposal of fixed assets.
13. All vehicle pink slips should be secured at the district office.
14. Individuals performing textbook inventory control and asset tagging should be cross-trained so that the functions can be performed in their absence.
15. Textbooks from the district's centralized inventory should be offered to sites prior to purchasing new items. Sites should have access to the online textbook inventory system.
16. County administrator/board action declaring instructional materials obsolete should preclude any disposal. Safeguards related to the disposal of surplus or undistributed obsolete instructional materials should be implemented, and the district should ensure that staff reconcile the items sold/recycled/taken to the dump with those the county administrator/board approved for surplus.



## Standard Not Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	1
July 2017 Rating:	0
July 2018 Rating:	0
July 2019 Rating:	0
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	0
July 2022 Rating:	0





## 17.1 Food Service Fiscal Controls

### Professional Standard

To accurately record transactions and ensure the accuracy of financial statements for the cafeteria fund in accordance with GAAP, the LEA has purchasing and warehousing procedures to ensure that these requirements are met.

### Findings

1. Unaudited actuals for the 2020-21 fiscal year show that the ending balance in the cafeteria fund decreased from \$2.1 to \$1.8 million.
2. Although prior years' patterns reflected income outpacing expenditures, as of fiscal year 2018-19 that was no longer the case. As shown in the table below, the cafeteria fund balance has been decreasing since 2018-19. However, the cafeteria still has a significant ending balance and has continued to make purchases to align with the three-year plan to spend down the fund balance. Correspondence from the CDE, dated October 4, 2021, indicated that the spend-down agreement was extended through the 2021-22 school year.

*Cafeteria Fund-Unaudited Actuals, 2015-16 through 2020-21*

Unaudited Actuals	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Beginning Balance	\$920,296	\$1,505,126	\$2,342,779	\$2,952,292	\$2,910,705	\$2,106,512
Adjustments/Restatements	\$0	\$363,321	\$198,806	\$49,287	\$0	\$389,820**
Adjusted Beginning Balance	\$920,296	\$1,868,447	\$2,541,585	\$3,001,579	\$2,910,705	\$2,496,332
Revenues	\$5,249,767	\$4,877,680	\$4,391,398	\$4,275,759	\$3,199,035*	\$2,057,750
Expenditures	(\$4,664,937)	(\$4,403,348)	(\$3,980,692)	(\$4,366,633)	(\$4,003,228)	(\$2,737,332)
Ending Balance	\$1,505,126	\$2,342,779	\$2,952,292	\$2,910,705	\$2,106,512	\$1,816,750

\* Includes general fund transfer of \$245,134

\*\* Includes an audit adjustment of \$388,614 and a restatement of \$1,206

3. The cafeteria fund's accounts payable balances have continued to decrease since June 2018, with an accrued liability of \$211,465 as of June 2021.

The cafeteria fund's accounts receivable balances in prior years had remained high, with an accrual of \$1,135,639 as of June 2019. The unaudited accounts receivable balance reported as of June 30, 2020 was zero; however, the 2019-20 audit report showed the district understated accounts receivable by \$368,814 at year-end close, so the audited ending fund balance was increased by this amount. The 2020-21 unaudited actuals showed that the district booked an audit adjustment of \$388,614, rather than \$368,814 as shown in the prior year audit. The 2020-21 unaudited actuals showed an accounts receivable balance of \$669,396, and the 2020-21 audit report did not include any audit adjustments for the cafeteria fund.

4. The 2021-22 first interim report shows that the district budgeted 5% rather than the maximum allowable indirect cost rate of 5.48% in the cafeteria fund.



5. The June 23, 2021 board meeting included approval of the district's membership in a purchasing cooperative for frozen, refrigerated, processed commodity and/or commercial food products. The August 25, 2021 board meeting included approval to participate in a piggyback bid for paper products. Interviews indicated that due to the district's relatively small size, it continues to use piggyback bids from other school districts to purchase food service products.
6. Interviews indicated time certifications for employees who are paid with federal food service funds are maintained, and that employees sign the semiannual certification. Sample time certifications provided to FCMAT show that numerous Food Services Department staff completed semiannual certifications for July-December 2021; however, some of the forms were not thoroughly completed (e.g., no account codes and missing signature dates). Due to the pandemic, several employees from other departments had been assisting the Food Services Department during the prior review period. If employees from other departments have continued to assist with food service duties and been paid with federal food service funds, federal regulations require these employees complete time certifications.
7. Current performance reports are not maintained. Maintaining monthly financial reports, such as meals per labor hour and profit and loss statements, provides management with a way to more quickly identify variances in income and expenses, determine the ongoing impacts, and implement any necessary remedies.
8. As stated in Standard 10.4, the PeopleSoft accounts payable system uses individual invoice numbers to check for duplicate payments. In prior review periods, interviews indicated that individual vendor invoices are not entered in the accounting system for all food service vendors. Some vendor invoices are batch processed, and payments are made based on summary statements. This does not allow the computer system to monitor for duplicate invoices. If using a batch system, manual internal controls must be added to reduce opportunities for duplicate payments. During this review period, staff indicated the invoice numbers are also entered on an Excel spreadsheet to determine if there are any duplicates.
9. During the prior review period, the district was restructuring the Food Services Department. On August 30, 2021, the district hired a director of fiscal services whose duties include oversight of food service, along with the two food service operations managers. With the restructuring, the district will need to continue efforts to ensure adequate staff training, including training for the direct certification process and accurate free and reduced-price meal counts when applicable, and ensure financial and compliance reporting are done accurately and in a timely manner.
10. Bank reconciliations provided to FCMAT showed that staff perform a monthly reconciliation of the food service clearing account, and a secondary reviewer signs and dates the reconciliation. However, some of the reconciliations were not completed in a timely manner and/or accurately (e.g., the bank statement ending balance shown on the



reconciliation did not match the ending balance on the bank statement and in transit deposits shown on the reconciliation were already included on the bank statement).

11. The Food Services Department uses a spreadsheet to track all of its petty cash expenditures. During the prior review period, no documentation was provided to support the expenses or show who authorized them. The January 5, 2022 Petty Cash Reconciliation provided to FCMAT did not show any transactions during the current review period, and staff indicated that petty cash has not been used during the pandemic.
12. Interviews indicated that the Food Services Department is responsible for tagging its own fixed assets. The tags are received from the warehouse, and food service staff maintain equipment inventory lists by school site; however, staff do not know how new purchases, moved items or relieved food service assets are updated on the main district asset list.

## **Recommendations for Recovery**

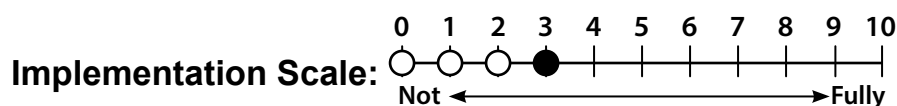
1. The district should monitor its cafeteria fund spend-down plan to ensure that the expenses are not ongoing and do not create an operating deficit that requires a contribution from the unrestricted general fund in future years.
2. The district should ensure that food service management staff is knowledgeable about program requirements, including the state's Administrative Review process.
3. The district should ensure that year-end accounts receivable and accounts payable balances are supported with detailed transaction documentation that includes vendor/payee and amount. All items should be reviewed and cleared by the first interim reporting period.
4. The district office should continue to review the balance sheet items of the cafeteria fund as part of financial closing. Any unusual balances should be investigated.
5. Audit adjustments recommended by the independent auditor should be posted in a timely and accurate manner.
6. The district should budget and charge the full allowable indirect cost rate to the cafeteria fund.
7. The district should ensure staff is trained on the proper procurement processes and regulations necessary to seek bids, requests for proposals, and requests for quotes to make sure it obtains the best prices available.
8. The district should follow requirements for federal time reporting for all employees who are paid from federally funded programs and ensure certification forms are thoroughly completed.



9. The district should ensure that food service management staff properly analyze the financial aspects of the food service program monthly and perform the basic calculations necessary to analyze profitability and identify areas of concern.
10. If a batch system is used to enter vendor invoices in the accounting system, manual internal controls should continue to be used to replace the PeopleSoft controls to reduce opportunities for duplicate payments.
11. The district should continue to be vigilant and support efforts to ensure adequate training for food service staff.
12. Bank accounts should be timely and accurately reconciled, and the work should continue to be dated, reviewed, and signed by a supervisor monthly. Variances, stale-dated checks and lingering deposits in transit should be investigated and addressed in a timely manner.
13. The Food Services Department should maintain logs with supporting documentation and authorization for all expenses charged to its petty cash fund.
14. The district should centralize all purchasing, bidding, tagging and salvage procedures. This would ensure that one individual or department was responsible for all items districtwide. This would centralize knowledge, standardize procedures and increase accountability.
15. Checks for the disposal of surplus items that were purchased with food service funds should be deposited in the cafeteria fund.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	2
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 20.1 Special Education

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### Professional Standard

The LEA actively takes measures to contain the cost of special education services while providing an appropriate level of quality instructional and pupil services to special education students. The LEA meets the criteria for the maintenance of effort requirement.

### Findings

1. Effective with the 2017-18 school year, the Southwest SELPA transferred administrative and program responsibilities from LACOE to Lawndale Elementary School District. As of fiscal year 2018-19, the Southwest SELPA is responsible for supervising all special education programs and coordinating regionalized services between all member districts, and LACOE no longer provides regionalized services to the district.

As part of the program takeback, the member districts voted to partially support the regionalized services costs for three years with a SELPA subsidy. The procedure states that the subsidy will be prorated between special day class/related services and itinerant costs, based on the proportion of each cost group to the total of all costs, ultimately reducing the amounts the district paid for regionalized services. The allocated subsidy amounts were \$8 million in both 2018-19 and 2019-20 and were reduced to \$4 million in 2020-21. Beginning with fiscal year 2021-22 the SELPA will not supplement the regionalized services program. The district's 2021-22 costs for regionalized services are estimated to be \$1.88 million, which includes a reduction of \$614,115 for various revenue offsets.

2. The district still contracts with outside agencies for all speech-related services including assessment, progress monitoring and IEP participation; however, now the district meets monthly with the agencies. A district program specialist participates in all IEPs, so agencies are not exclusively managing these services provided to students. As mentioned in previous reports, using an outside agency to assess students, determine the level of service students need and provide speech services can create a conflict of interest and is not a best practice.
3. The district filed eight claims for reimbursement related to the extraordinary cost pool for students who attended an NPS/LCI in fiscal year 2020-21. According to LACOE Bulletin 5426, extraordinary cost pool claims are now filed using the CDE's Principal Apportionment and Data Collection (PADC) Software. Each claim submitted must be signed by the district's SELPA director and include copies of all paid invoices and warrants and other documentation to support the claim. The Extraordinary Cost Pool Claims provided to FCMAT for review do not include the signature of the SELPA director, nor do they include the additional required backup documentation. Total expenses in the reimbursement calculation should include tuition and all other costs for services not excluded in Education Code Section 56836.20. However, due to the lack of supporting documentation, FCMAT cannot verify what makes up the total costs for each claim submitted.



4. According to interviews, the district is utilizing the shared email account between the Special Education and Business Services departments to ensure that both departments receive all NPA/NPS invoices. The Special Education Department staff has created a spreadsheet that tracks NPA and NPS expenditures for each vendor and student by month. To simplify the extraordinary cost pool expenditure tracking, the district should track the NPA and NPS expenditures separately. Each student's expenses and eligibility should also be closely monitored to ensure documentation is sent to the SELPA by the required deadline for all eligible students who exceed the 2021-22 threshold of \$84,933.06.
5. The SELPA-estimated funding from the mental health allocation has decreased from \$809,265 in 2016-17 to a projected \$208,782 for 2020-21. The 2021-22 revenue estimate was not provided. The SELPA reimburses LEAs based on the number of all eligible students receiving related mental health services. The SELPA also reimburses a portion of the costs of students in residential treatment centers. To maximize mental health funding allocated by the SELPA, it is imperative that all mental health expenditures be identified, documented and reported to the SELPA. It is also important that billings from the NPS show mental health charges separately, and that payments be split funded with mental health and counseling expenses coded separately so the district can properly document expenditures and receive reimbursement. As of the date of FCMAT's fieldwork, the 2021-22 mental health budget showed no year-to-date expenses.
6. The district provided FCMAT with a 2021-22 SELPA Regional Excess Cost document dated October 8, 2021. This document provides the district with the preliminary regional program cost amounts, which get updated at various times throughout the fiscal year. However, the district's first interim report did not match the estimated expenditure amounts as stated on the billing document. Although this cost estimate can fluctuate throughout the year as the SELPA updates it, the district should closely monitor its budgeted expenditure projection to ensure it is not overstating or understating the amount.
7. As stated in letters from the county office in response to the district's financial reports, the county continues to be concerned about the year-over-year increased financial strain that the special education program expenditures have on the unrestricted general fund. The county office, in collaboration with the CCEE and district staff, assembled a team to provide focused technical assistance to the district and to assist in identifying program inefficiencies and budget overages. The district continues to receive assistance from the county office team to build capacity and update policies and procedures.
8. Interviews indicated that the district is considering another reorganization of the Special Education Department, with the addition of several central office positions and more program specialists. Proposed changes that would further increase expenditures are concerning given the continued increased cost of the district's special education program.

As stated above and in the prior year report, FCMAT is concerned with any proposed changes that would increase expenditures in an operational area that the district should be analyzing for improved efficiencies. FCMAT's review of the program specialist positions in fiscal year 2020-21 showed there were 7 FTEs. On March 10, 2021 the district approved a



resolution to layoff 7 FTE program specialists, effective for the 2021-22 school year. On May 26, 2021 the district approved a revised job description and pay range for program specialist (special education generalist/teacher on special assignment). For the 2021-22 fiscal year, the district added a program specialist that is assigned as a teacher on special assignment. The increased cost of salaries between the two fiscal years according to the district's position control report is \$129,172. While two positions are vacant, and the increase in expenditures may not materialize due to salary savings, FCMAT remains concerned that the district continues to increase costs within the special education program.

9. As stated earlier, the district has taken some steps to encourage communication between the Business Services and Special Education departments regarding NPA/NPS concerns. Interviews indicated that administrators from both departments are now meeting weekly to discuss the SELPA's excess cost billings and review the budget. However, this communication should be expanded to discuss topics such as: budget development and monitoring, maintenance-of-effort requirements, additional staff requests or change in assignments, NPS/NPA contracts and invoices, due process and complaint issues, staff caseloads, identified student counts, and identified program needs. To provide for consistent data districtwide, the HR Department should be included when meeting topics involve staffing issues.
10. Maintenance-of-effort documentation provided to FCMAT indicates that the district's 2020-21 unaudited actuals unrestricted general fund contribution to special education programs (including special education transportation) was \$22.8 million or 76.73% of total special education expenditures; the 2019-20 unaudited actuals contribution was \$25.2 million or 79.16%. The statewide average unrestricted general fund contribution to special education was 67.17% for 2019-20 and 64.44% for 2020-21.

## **Recommendations for Recovery**

1. The district should monitor and conservatively budget for regionalized services excess costs. Since the SELPA eliminated the excess cost subsidy, the budget and MYFP projections should be adjusted as needed for increased excess costs. When 2021-22 is billed, a reasonableness analysis should be performed, and major variances should be investigated.
2. The district should continue to investigate plans for delivery of speech and language services to reduce reliance on outside providers. The district should ensure that assessments are done by a different provider than the provider of service.
3. The district should continue to ensure that there is always a representative from the district at IEPs where assessment results for speech and language services from outside agencies are discussed.
4. The costs for students who may qualify for special education extraordinary cost pool reimbursements should continue to be monitored and tracked. Reimbursement claims should be submitted timely and should be reviewed to ensure that all qualified students are reported. The executive director of special education should review and approve the filing.
5. Communication between the Special Education and Business Services departments



should be formalized so that appropriate amounts are budgeted each year. The district should implement a working group to resolve any data inconsistencies between the Special Education, HR and Business Services departments.

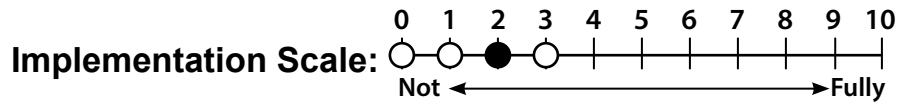
6. The special education budget should be reviewed and updated after the completion of the prior year unaudited actuals in September and again before completion of the first and second interim reports.
7. The fiscal impact of program transfers should be evaluated prior to implementation. In addition, the business office should communicate with the SELPA so that the full impact of decisions to become a SELPA-provider district is understood prior to implementation.
8. The district should ensure it captures and reports all reimbursable mental health expenses incurred before developing additional services that appropriately expend local mental health funds.
9. The district should regularly review NPS billings to determine where expenses can be reduced and what mental health expenses should be charged against mental health funding.
10. The county administrator should continue to attend all the monthly SELPA superintendents' council meetings because this position is the voting member representative for the district. The business office should continue to work with the Special Education Department to review the SELPA funding projections to ensure the accuracy of all funding calculations, and the physical receipt of funding. The business office should then follow up on any discrepancies between budgeted income and actual income received.
11. The CBO or designee in the business office responsible for the special education budget should continue to attend SELPA business meetings, particularly when the funding model is discussed and/or modified. If the district designates someone other than the CBO, the designee should communicate relevant information to the CBO after each meeting.
12. The district should continue to monitor its unrestricted general fund contribution to special education.
13. The Special Education Department should be involved in budget development and receive a copy of the special education budgets and staffing lists several times a year and prior to year-end. The Business Services and Special Education departments should review these documents and update them accordingly and should meet regularly to discuss the budget and other relevant topics.
14. District staff should generate expenditure and income trend data and analyze it compared to data from comparable districts to support informed discussion and program management.
15. A reasonableness review and analysis of variances should be performed before the submission of any special education budget, interim reports, and the maintenance of effort. Variances should be investigated before finalizing the report.



16. Prior to restructuring the Special Education Department, the district should compare the department's organizational structure and staffing to that of several districts of similar size and student demographics. Changes that would further increase ongoing expenditures should be avoided.
17. The number and costs of due process filings should be tracked and reviewed to identify areas of potential risk and to contain the cost of such filings.

### Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	0
July 2017 Rating:	0
July 2018 Rating:	0
July 2019 Rating:	0
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	0
July 2022 Rating:	2





## 21.1 Transportation

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### Professional Standard

The LEA actively takes measures to control the cost of transportation services and limit the contribution from the general fund while providing safe and reliable transportation to the students.

### Findings

1. Although the district provides most of its own special education student transportation, staff reported that LACOE transports some students because of lack of capacity.

A review of LACOE invoices received to date for 2021-22 special education transportation found that LACOE transports on average 21 students. The district approved the agreement for regional school transportation services (RSTS) for special education students at the June 30, 2021 board meeting, with a not to exceed amount of \$1,297,650. FCMAT's review of the monthly invoices shows that LACOE charges the district a support fee of 15% but increased the fee to 16% in September 2021. The contract as approved does not state what the county office will charge annually for this fee.

2. The district also used transportation services from other vendors, not related to special education. FCMAT did not find contracts for these services on the board agendas for this review period. However, each of the vendors had a purchase order for various amounts. One of the vendor's payments through January 2022 was nearly \$10,000, which is close to the \$10,000 bid threshold for home-to-school transportation contracts per Education Code Section 39802. In addition, the district's purchasing policies require competitive bidding for purchases more than \$10,000.
3. The Annual Report of Pupil Transportation previously filed with the state is no longer required beginning with the 2013-14 fiscal year. This report required the Transportation and Business Services departments to review year-end data and calculate cost per mile for home-to-school, the number of students transported, cost per pupil, the number of buses and many more statistics. Without this report, these departments will need to mutually determine the management data and information necessary to properly manage the Transportation Department expenses. No management reports or statistics were available for FCMAT's review. Districts receive the same amount of funding for transportation that they were entitled to prior to the implementation of the LCFF in 2013-14. Under LCFF, the transportation revenues have never received a COLA and are subject to a maintenance of effort that requires districts to spend the lesser of the actual 2012-13 expenditures or the amount received in 2013-14. According to the documentation provided to FCMAT, the district is spending significantly more than its entitlement. Per the 2020-21 unaudited actuals, the district spent approximately \$1.8 million, and its entitlement is \$962,143.
4. Expenses should be properly coded to the respective transportation programs using a reasonable methodology. Based on information provided in interviews the district only transports special education students. However, the monthly SC Fuels bill was expensed 50% to special education and 50% to home-to-school transportation. The SC Fuels bill's



50%/50% split did not appear to be distributed using a reasonable methodology. It is imperative for information to be consistent and reliable to adequately report and control the cost of student transportation.

5. Interviews with business office staff indicated that field trip requisitions are entered in the Informed K12 system by sites and departments, using a designated account code. After each field trip the Transportation Department notifies the business office accounting specialist that the field trip is complete and that it is okay to bill the appropriate site or department. FCMAT's review of the documents provided shows that no journal entries for field trips were processed in 2020-21, and only a few had been processed through January for 2021-22. FCMAT's review of the general ledger and budget reports shows that object code 5811 has been designated for field trips; however, vendors that provide transportation services unrelated to field trips are also paid from this object code.
6. Interviews with administration indicated that as part of the recovery plan in 2013-14, the district intended to reduce the assignment of eight-hour drivers. During the prior review period, there were no eight-hour drivers. There are two eight-hour drivers according to the 2020-21 and 2021-22 transportation rosters. The district also employed 11 bus drivers working five to six hours per day as of fiscal year 2019-20; but the 2020-21 roster shows that all bus drivers that were working five hours have been increased to six hours. The district also has a van driver who works five hours per day. Based on the district's historical and projected structural budget deficit and reduced student transportation services provided in 2020-21, it is unclear why the hours for bus drivers were increased.
7. Prior to the closure of schools due to the pandemic, the district continued to operate special education routes using many modes of transportation service including reimbursing parents for mileage to bring their student to school, passenger vans, taxis, independent contractors, and county office transportation services. While the district should attempt to transport students utilizing the most cost-effective mode of transportation, the deputy chief maintenance and operations officer should be a resource in determining the most cost-effective means of transportation. Budget accuracy could be improved if all transportation contracts were managed by the Transportation Department because they have knowledge of issues such as vehicle maintenance, insurance requirements, DMV pull notices and fingerprinting regulations, and appropriate contracts to support the safe transport of students. Previous interviews with special education administration indicated that they were unaware of the PCC and Education Code Section 39802 requirements for procuring bids for transportation services that exceed \$10,000 (See Standard 10.5).
8. In its prior reports, FCMAT recommended that the district ensure the student information contained on various student lists remain consistent with the actual number of severely disabled and orthopedically impaired (SD/OI) students transported, and that this information should be verified against student IEPs accordingly. During the 2015 review period, the special education staff reported that student names were reconciled with students enrolled and transported by LACOE. However, since that review period, there is inadequate evidence that the LACOE transportation billings are reconciled to the student roster. The 2020-21 and 2021-22 invoices reviewed by FCMAT do not have



an authorized signature from the Transportation or Special Education departments for payment, and there are no notations or corrections on any of the monthly student rosters. This suggests that neither department is reviewing to ensure that all data is consistent and accurate.

9. A review of the 2020-21 financial reports indicates that all LACOE transportation expenses are now charged directly to special education in resource code 92400, where they have been comingled with other contracted transportation services. At year-end the district's budget for special education transportation contracted services was \$361,325 (object code 5811), but actual expenditures were \$717,512, which is significantly more than what the district had budgeted.
10. The district continues to use the SC Fuels Fleet Card system, allowing drivers access to unattended automated commercial fueling stations 24 hours a day through a card lock system. The system provides detailed logs that include the date and time of purchase; individual driver and vehicle number; as well as the type of fuel, the number of gallons pumped and the location of the station. As previously reported, the district does not reconcile detailed statement information that is provided with the SC Fuels Fleet Card system. Documents provided to FCMAT show that some internal controls available based on information contained in the monthly statement have not been implemented. For example, although cards are to be issued based on the vehicle driven, purchases were observed in which a vehicle was filled one day with diesel fuel and other days with gasoline. In addition, several individuals repeatedly entered a variety of odometer readings over multiple months for multiple vehicles. If odometer recordings were consistent, a reasonableness check could be performed to determine if vehicle fuel usage is accurate.
11. A separate independent report on transportation was completed on May 6, 2019 by PTI Consulting. The district also approved a Phase II agreement with PTI Consulting, for an additional cost of \$40,000, to assist the district with findings that are critical and need immediate remedy. The term of the agreement was from May 7, 2019 through August 31, 2019, and states that the consultant will provide on-site and off-site management assistance for the district vehicle maintenance program. Two amendments to the Phase II agreement were approved for an additional cost of \$30,000, and the term was extended through June 30, 2020. The district ratified an agreement with PTI Consulting on June 23, 2021. This agreement is to provide the district with on-site and off-site management assistance and written progress assessments in support of the district's transportation delivery system. The term of the agreement is from April 29, 2021 through June 30, 2022 with a not to exceed amount of \$40,000. Since the ratification of the original agreement, two amendments to the agreement were approved for an additional cost of \$115,000. The new not-to-exceed amount is now \$155,000 as approved during the November 3, 2021 board meeting. This is an example where the district is using an outside consultant to perform essential duties that could be handled by district personnel if that employee had the correct qualifications and training, which most likely would result in savings for the district and would help build internal capacity.



## Recommendations for Recovery

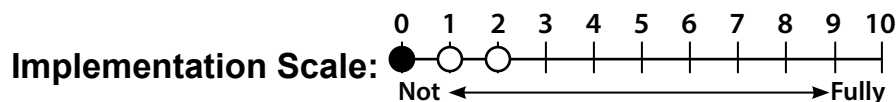
1. The district should develop processes and procedures to ensure that information on the number of students transported and the means used to transport them is consistent and reliable.
2. The district should regularly charge the cost of field trips to individual programs and ensure the expenses are posted timely. Staff should ensure that all expenses are charged to the correct object codes.
3. The Transportation and Special Education departments should evaluate the costs of transportation provided by the county office, NPS and transportation service companies to determine whether the district can transport these students more cost effectively.
4. The district should review, approve and reconcile all transportation billings. The Special Education and Transportation departments should both review and approve all invoices to ensure that all district data is consistent with the actual number of SD/OI and RSTS students enrolled and transported.
5. To manage transportation expenses, the Transportation Department should regularly have access to its budgets and expenses. Transportation budgets, including those for expenses related to county and independent contractor provided services, should be reviewed for reasonableness and invoices should be reviewed and approved prior to payment.
6. The district should ensure the transportation maintenance-of-effort expenditure level is maintained based on the requirements of LCFF.
7. The district should request that detailed log information from its fuel vendors be forwarded to the business office and Transportation Department monthly. Individuals should not approve their own fuel expenditures. Employees who use fuel cards should receive training and be required to sign off on receipt of fuel card policies/procedures. Logs of employees responsible for identified cards on each day should be maintained. Information received from the third-party logs should be regularly analyzed and reviewed with anomalies investigated.
8. The district should provide a copy of all the findings and recommendations from independent reports to the departments and employees involved so that they can develop an implementation plan and assign tasks and duties.
9. Expenses for transportation costs should be properly budgeted and expensed to the correct cost center accounts to facilitate analysis and ensure that all expenses are accounted for in the adopted budget.
10. All contracts and costs related to special education transportation should be monitored and managed by the Transportation Department.
11. The district should ensure that its Transportation Department is staffed appropriately.



12. To reduce costs, an individual from the Transportation Department should be consulted in each IEP and advised of all contracts to provide student transportation. All contracts for special education transportation services should be reviewed by the Transportation Department prior to county administrator/board approval.
13. The district should ensure that transportation services are procured in accordance with Public Contract Code and Education Code requirements.
14. No transportation of district students by a contractor should occur until a fully executed contract is in place.
15. The district should analyze the impacts and project the associated increases or decreases in the cost of transportation prior to modification of school bell schedules.
16. The district should review transportation costs and prepare a trend analysis to isolate variances in expenditure categories.
17. The district should compile and analyze the necessary data and identify the cost of any program or delivery method modifications that may affect its transportation program, ensuring that it will reduce costs and/or generate income.
18. The district should analyze the costs and benefits of hiring a qualified individual, or providing training to an existing employee, to perform the duties being performed by outside consultants.

## Standard Not Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	0
July 2018 Rating:	0
July 2019 Rating:	0
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	0
July 2022 Rating:	0





## 22.1 Risk Management – Other Post-Employment Benefits

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### Legal Standard

LEAs that provide health and welfare benefits for employees upon their retirement, and those benefits will continue past the age of 65, shall provide the board an annual report of actual accrued but unfunded costs of those benefits. An actuarial report should be performed every three years. (EC 42140)

### Findings

1. GASB 74 (applicable only for prefunded plans with irrevocable trusts) and GASB 75 (employer accounting), replaced GASB 43 and 45 in June 2015. Statement No. 74 is not applicable to Inglewood Unified School District because it does not have an irrevocable trust. GASB 75, Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions, is effective for plan years beginning after June 15, 2017, and requires employers to update OPEB actuarial reports every two years.

The purpose of Statement No. 75 is to improve financial reporting requirements for local governmental employers and present a more realistic unfunded OPEB liability on the balance sheet of the governmental financial statements. Governmentwide financial statements must now include the total liability related to OPEB.

The district continues to comply with the requirements of GASB 75. The most recent actuarial report prepared for the district was dated December 14, 2020. The valuation report covers the district's OPEB liability as of July 1, 2019. Plan membership as of July 1, 2019 includes 46 retirees and 969 active employees who may attain eligibility for benefits in the future.

An updated report was prepared for the district and presented to the board at its September 15, 2021 meeting. The Schedule of Changes in Total OPEB Liability supplemental schedule dated September 10, 2021, provides for the following updates:

Total OPEB Liability – June 30, 2019 (July 1, 2018-June 30, 2019)    \$22,927,763

Total OPEB Liability – June 30, 2020 (July 1, 2019-June 30, 2020)    \$25,212,931

2. The district funds this OPEB liability using the pay-as-you-go method. For the 2021-22 fiscal year under this funding method, the district's cost is \$550,812. The following table also shows the incremental cost for each of the next three years, as indicated in the December 14, 2020, actuarial report.



Fiscal Year	Pay-as-you-go	% Increase from the prior year
2020-21	\$ 412,314	18.87%
2021-22	\$ 550,812	33.59%
2022-23	\$ 711,893	29.24%
2023-24	\$ 843,751	18.52%
2024-25	\$ 864,467	2.45%

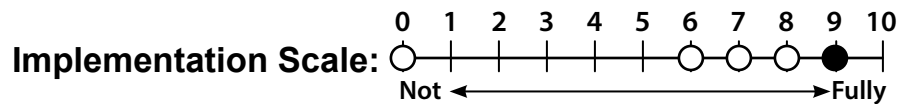
Based on the actuarial projection and method of payment, the district's payment will increase substantially each fiscal year, almost doubling by 2027-28 reaching a cost of \$1,062,184.

## Recommendation for Recovery

1. The district should continue to ensure that a current actuarial report is prepared every two years, as required by GASB 75, that it is presented to the county administrator/board and that the increasing projected costs are appropriately accounted for in its budget and multiyear financial projections.

## Standard Fully Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	0
July 2018 Rating:	6
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	9





## 22.2 Risk Management – Other Post-Employment Benefits

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### Professional Standard

The LEA has a comprehensive risk-management program that monitors the various aspects of risk management including workers' compensation, property and liability insurance, and maintains the financial well being of the LEA. In response to GASB requirements, the LEA has completed recent actuarial reports for workers' compensation and property and liability. The actuarial assumptions properly track to the LEA's budget assumptions and include the benefits being provided under existing plans.

### Findings

1. The district is self-insured for its workers' compensation program. Since July 1, 2013, Keenan & Associates (Keenan) administers the program on behalf of the district. Keenan provides many online training programs designed for safety and accident prevention, to assist school districts. The district uses a self-insurance fund (fund 67) to account for workers' compensation activities.
2. The executive director of HR continues to maintain an online system of interactive workers' compensation forms accessible to all district staff for reporting claim incidents. All departments and school sites have digital access to the district's Google drive, and claims processed through this online portal allow the district to comply with mandated timelines for reporting and creates an OSHA log that identifies potential reportable issues. This system incorporates a medical release form and all necessary disclosure requirements.
3. The district contracts with a workers' compensation clinic that provides an online portal to give the executive director of HR immediate access to injury and work status. The district continues a transitional return-to-work program that allows injured workers the ability to return to work based on limitations prescribed by the clinic. The district continues using online safety trainings for professional development as well as injury prevention.
4. The executive director continues developing and monitoring digital processes and training opportunities focused on employee safety and a healthy work environment. The district continues to use an interactive form to track sick leave in accordance with Education Code provisions and bargaining unit language. Automated tools are used to calculate available leave categories and differential pay for industrial leaves and provide the necessary information to calculate leave data and the appropriate reduction to individual payroll records, if necessary. The executive director continues to seek opportunities to automate systems in environments that are easily maintained and accessible to department personnel.
5. The district contracted with AON Risk Solutions (AON) to complete an updated workers' compensation actuarial study. The report dated January 24, 2022 covered the period through April 30, 2021 and extrapolated to June 30, 2021. A significant reduction in claims



frequency was assumed for the 2019-20 and 2020-21 fiscal years due to stay-at-home orders resulting from the COVID-19 pandemic. As a result, the report further notes an increased level of uncertainty in estimated claims valuation. According to this report, the district's estimated outstanding losses (cost of unpaid claims) is \$10,189,503. The workers' compensation actuarial study found that the present value of estimated outstanding losses as of June 30, 2021, is \$9,502,346. The district maintains a self-insured retention of \$650,000, which is projected to be maintained through 2021-22. Based on a self-insured retention of \$650,000, the projected expected payroll loss rate is \$4.81 per \$100 of payroll and a present value loss rate of \$4.44. This reflects an increase of 1.9% in payroll and a 3.2% increase in loss rate. Review of the district's 2021-22 general fund budget indicates a rate of \$4.255 per \$100 of payroll has been budgeted for planning purposes. The total assets retained by the district in the self-insurance fund (fund 67) as of June 30, 2021 were \$8,028,724.40.

The number of claims per \$1 million of payroll steadily decreased from 2014-15 through 2017-18 from 1.95 to 1.11, and the average cost per claim increased from \$15,943 to \$24,735. In 2018-19 the trend shifted upwards with claims per \$1 million of payroll increasing to 1.49, and the average cost per claim increasing to \$40,461, but in 2019-20 the trend returned to its downward trajectory falling to 0.97 per \$1 million of payroll; but the average cost per claim rose to \$45,884. The AON report illustrates the number of paid claims from 2016-17 to 2020-21, as shown in the following table.

#### *AON Risk Solutions*

##### *Actuarial Report*

##### *Size of Loss Distribution by Fiscal Year*

Fiscal Year	Reported Claim Count	Reported Incurred Losses
2016-17	112	\$2,234,617
2017-18	68	\$1,384,227
2018-19	88	\$2,687,441
2019-20	42	\$1,145,496
2020-21	17	\$316,713

During the 2020-21 fiscal year the district budgeted \$1.98 million for workers' compensation claims payments and incurred expenditures of approximately \$2.39 million. A great deal of uncertainty relative to the impact of the COVID-19 pandemic significantly impacted claims estimates for the 2020-21 fiscal year. The district's 2021-22 budget has been increased slightly to \$2.03 million; however, as of January 2022 expenditures that exhaust more than 73 percent of that budget have already been recorded.

- The district budgeted \$1,275,000 for property and liability insurance premiums in the 2020-21 fiscal year. No changes were made to this budgeted figure for the 2021-22 fiscal year. However, total expenditures for 2020-21 exceeded that budget totaling \$1,352,825.77, 6% over budget. District staff indicated that the deductible of \$1 million per claim remains unchanged.



7. Joint Powers Authority, Alliance of Schools for Cooperative Insurance Programs (ASCIP) has historically assisted the district with the coordination of school site safety and playground audits conducted by POMS & Associates. The district contracted with POMS & Associates through ASCIP to conduct a safety inspection at each school site between February 23 and March 21, 2017. A progress summary document prepared by POMS dated April 1, 2019, shows that there were 33 immediate and 176 high-level concerns. While some of the deficiencies noted in the 2019 progress report may have been mitigated through school site modernization and facility projects, no subsequent school site inspections have been conducted to ascertain progress.

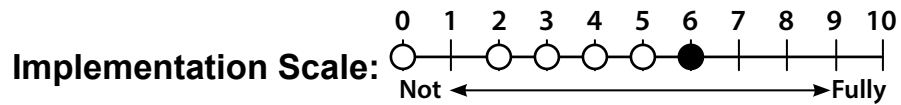
## **Recommendations for Recovery**

1. The district should continue to monitor program implementation for online processing of forms for workers' compensation claims, including information to managers and supervisors.
2. The district should closely evaluate the workers' compensation rate applied against payroll and the asset balance held in the self-insurance fund to ensure the rate charged is sufficient to address estimated outstanding losses.
3. The district should review prior year actual expenditures and adjust current year budgets as necessary rather than rolling over prior year budget amounts. Current year budgets should be reviewed and adjusted at least at interim reporting periods.
4. The district should continue to monitor timelines for required actuarial reports to ensure they are completed in a timely manner to avoid audit findings and ensure compliance with generally accepted accounting principles.
5. The district should provide timely safety assessments for all school sites and implement the resulting recommendations to correct hazardous conditions.



## Standard Partially Implemented

July 2013 Rating:	4
July 2014 Rating:	4
July 2015 Rating:	0
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6









# **Table of Financial Management Ratings**







Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>1.1</p> <p>PROFESSIONAL STANDARD – INTERNAL CONTROL ENVIRONMENT All board members and management personnel set the tone and establish the environment, exhibiting high integrity and ethical values in carrying out their responsibilities and directing the work of others. Appropriate measures are implemented to discourage and detect fraud. (Statement on Auditing Standards (SAS) 55, SAS 78, SAS 82: Treadway Commission)</p>	0	0	1	1	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2
<p>1.3</p> <p>PROFESSIONAL STANDARD – INTERNAL CONTROL ENVIRONMENT The organizational structure clearly identifies key areas of authority and responsibility. Reporting lines in each area are clearly identified and logical. (SAS 55, SAS 78)</p>	1	0	3	4	4	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
<p>2.1</p> <p>PROFESSIONAL STANDARD – INTER- AND INTRADEPARTMENTAL COMMUNICATIONS The Business and Operational departments communicate regularly with internal staff and all user departments on their responsibilities for accounting procedures and internal controls. Communications are written when they affect many staff or user groups, are issues of importance, and/or reflect a change in procedures. Procedures manuals are developed. The Business and Operational departments are responsive to user department needs.</p>	1	1	1	1	2	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
2.3	<p><b>PROFESSIONAL STANDARD – INTER- AND INTRADEPARTMENTAL COMMUNICATIONS</b></p> <p>The board is engaged in understanding the fiscal status of the LEA, for the current and two subsequent fiscal years. The board prioritizes LEA fiscal issues, and expects reports to align the LEA's financial performance with its goals and objectives. Agenda items associated with business and fiscal issues are discussed at board meetings, with questions asked until understanding is reached prior to any action.</p>	0	0	1	3	4	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	8
3.1	<p><b>PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT</b></p> <p>The LEA has developed and uses a professional development plan for training business staff. The plan includes the input of business office supervisors and managers, and identifies appropriate training programs. Each staff member and management employee has a plan designed to meet their individual professional development needs.</p>	0	0	1	1	2	2	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
3.2	<b>PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT</b> The LEA develops and uses a professional development plan for the in-service training of school site/department staff by business staff on relevant business procedures and internal controls. The plan includes a process to seek input from the business office and the school sites/ departments and is updated annually.	0	0	0	0	1	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	3
4.2	<b>PROFESSIONAL STANDARD – INTERNAL AUDIT</b> Internal audit findings are reported on a timely basis to the audit committee, board and administration, as appropriate. Management then takes timely action to follow up and resolve audit findings.	0	0	0	0	1	1	1	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	2
5.1	<b>PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS</b> The board focuses on expenditure standards and formulas that meet the goals and maintain the LEA's financial solvency for the current and two subsequent fiscal years. The board avoids specific line-item focus, but directs staff to design an entire expenditure plan focusing on student and LEA needs.	1	0	0	1	1	3	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
5.2	<b>PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS</b> The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.	1	0	1	1	1	2	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
5.3	<b>PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS</b> The LEA has clear policies and processes to analyze resources and allocations to ensure that they align with strategic planning objectives and that the budget reflects the LEA's priorities. The budget office has a technical process to build the preliminary budget that includes revenue and expenditure projections, the identification of carryovers and accruals, and any plans for expenditure reductions. The LEA utilizes formulas for allocating funds to school sites and departments. This may include staffing ratios, supply allocations, etc. Standardized budget worksheets are used to communicate budget requests, budget allocations, formulas applied and guidelines. A budget calendar contains statutory due dates and major budget development milestones.	0	1	3	2	2	3	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>6.1</p> <p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>The LEA adopts its annual budget within the statutory timelines established by EC 42103, which requires that on or before July 1, the board shall hold a public hearing on the budget to be adopted for the subsequent fiscal year. Not later than five days after that adoption or by July 1, whichever occurs first, the board shall file that budget with the county superintendent of schools. (EC 42127(a))</p>	7	8	7	7	8	9	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
<p>6.2</p> <p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>Revisions to expenditures based on the state budget are considered and adopted by the governing board. Not later than 45 days after the governor signs the annual Budget Act, the LEA shall make available for public review any revisions in revenues and expenditures that it has made to its budget to reflect funding available by that Budget Act. (EC 42127(h))</p>	0	0	5	7	8	9	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
<p>6.3</p> <p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>The LEA completes and files its interim budget reports within the statutory deadlines established by EC 42130, et. seq. All reports are in a format or on forms prescribed by the superintendent of public instruction and are based on standards and criteria for fiscal stability.</p>	2	2	5	5	6	6	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	9



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
7.2	<p>PROFESSIONAL STANDARD – BUDGET MONITORING</p> <p>The LEA implements budget monitoring controls, such as periodic budget reports, to alert department and site managers of the potential for overexpenditure of budgeted amounts. Revenue and expenditures are forecast and verified monthly. The LEA ensures that appropriate expenditures are charged against programs within the spending limitations authorized by the board.</p>	1	0	2	1	0	1	1	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	2
7.3	<p>PROFESSIONAL STANDARD – BUDGET MONITORING</p> <p>The LEA uses an effective position control system that tracks personnel allocations and expenditures. The position control system establishes checks and balances between personnel decisions and budgeted appropriations.</p>	1	0	4	4	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	3
8.1	<p>PROFESSIONAL STANDARD – ACCOUNTING</p> <p>The LEA forecasts its cash receipts and disbursements and verifies those projections monthly to adequately manage its cash. The LEA reconciles its cash to bank statements and reports from the county treasurer monthly.</p>	1	3	4	3	2	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>8.2</p> <p>PROFESSIONAL STANDARD – ACCOUNTING The LEA's payroll procedures comply with the requirements established by the county office of education, unless the LEA is fiscally independent. (EC 42646) Per standard accounting practice, the LEA implements procedures to ensure timely and accurate payroll processing.</p>	1	1	1	2	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
<p>9.2</p> <p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING School sites maintain an accurate record of daily enrollment and attendance that is reconciled monthly. School sites maintain statewide student identifiers and reconcile data required for state and federal reporting.</p>	2	2	2	2	2	2	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	5
<p>9.3</p> <p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Policies and regulations exist for independent study, charter school, home study, inter-/intra-LEA agreements, LEAs of choice, and ROC/P and adult education, and address fiscal impact.</p>	2	2	2	2	2	2	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7
<p>9.4</p> <p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.</p>	1	2	2	1	1	1	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
9.6	<b>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</b> The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.	2	1	4	4	4	3	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	4
9.7	<b>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</b> School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.	1	2	0	0	1	1	1	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	3
10.4	<b>PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING</b> The LEA timely and accurately records all financial activity for all programs. GAAP accounting work is properly supervised and reviewed to ensure that transactions are recorded timely and accurately, and allow the preparation of periodic financial statements. The accounting system has an appropriate level of controls to prevent and detect errors and irregularities.	1	1	1	1	1	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>10.5</p> <p>PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING The LEA has adequate purchasing and warehousing procedures to ensure that: (1) only properly authorized purchases are made, (2) authorized purchases are made consistent with LEA policies and management direction, (3) inventories are safeguarded, and (4) purchases and inventories are timely and accurately recorded.</p>	1	1	0	1	1	1	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2
<p>11.1</p> <p>LEGAL STANDARD – STUDENT BODY FUNDS The board adopts board policies, regulations and procedures to establish parameters on how student body organizations will be established, and how they will be operated, audited and managed. These policies and regulations are clearly developed and written to ensure compliance regarding how student body organizations deposit, invest, spend, and raise funds. (EC 48930-48938)</p>	2	1	1	1	0	0	1	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	2
<p>11.3</p> <p>LEGAL STANDARD – STUDENT BODY FUNDS The LEA provides annual training and ongoing guidance to site and LEA personnel on the policies and procedures governing Associated Student Body accounts. Internal controls are part of the training and guidance, ensuring that any findings in the internal audits or independent annual audits are discussed and addressed so they do not recur.</p>	1	1	0	0	0	1	1	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	1



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
<p>12.1</p> <p>LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS</p> <p>The LEA provides a multiyear financial projection for at least the general fund at a minimum, consistent with the policy of the county office. Projections are done for the general fund at the time of budget adoption and all interim reports. Projected fund balance reserves are disclosed and assumptions used in developing multiyear projections that are based on the most accurate information available. The assumptions for revenues and expenditures are reasonable and supported by documentation. (EC 42131)</p>	0	3	3	2	1	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	4
<p>12.2</p> <p>LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS</p> <p>The governing board ensures that any guideline developed for collective bargaining fiscally aligns with the LEA's multiyear instructional and fiscal goals. Multiyear financial projections are prepared for use in decision-making, especially whenever a significant multiyear expenditure commitment is contemplated, including salary or employee benefit enhancements negotiated through the collective bargaining process. (EC 42142)</p>	0	1	1	1	1	2	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
14.1 LEGAL STANDARD – IMPACT OF COLLECTIVE BARGAINING Public disclosure requirements are met, including the costs associated with a tentative collective bargaining agreement before it becomes binding on the LEA or county office of education. (GC 3547.5 (b)).	0	0	4	6	7	7	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
14.2 LEGAL STANDARD – IMPACT OF COLLECTIVE BARGAINING Bargaining proposals and negotiated settlements are “sunshined” in accordance with the law to allow public input and understanding of employee cost implications and, most importantly, the effects on the LEA’s students. (Government Code 3547, 3547.5)	0	0	2	4	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
14.3	<p><b>PROFESSIONAL STANDARD – IMPACT OF COLLECTIVE BARGAINING</b></p> <p>The LEA has developed parameters and guidelines for collective bargaining that ensure that the collective bargaining agreement does not impede the efficiency of LEA operations. Management analyzes the collective bargaining agreements to identify any characteristics that impede effective delivery of LEA services. The LEA identifies those issues for consideration by the governing board. The governing board, in developing its guidelines for collective bargaining, considers the impact on LEA operations of current collective bargaining language, and proposes amendments to LEA language as appropriate to ensure effective and efficient service delivery. Governing Board parameters are provided in a confidential environment, reflective of the obligations of a closed executive board session.</p>	0	0	2	3	5	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	6



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
15.2	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Management information systems support users with information that is relevant, timely, and accurate. Assessments are performed to ensure that users are involved in defining needs, developing specifications, and selecting appropriate systems. LEA standards are imposed to ensure the maintainability, compatibility, and supportability of the various systems. The LEA ensures that all systems are SACS-compliant, and are compatible with county systems with which they must interface.</p>	1	1	1	1	1	3	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	5



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
15.3	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Automated systems are used to improve accuracy, timeliness, and efficiency of financial and reporting systems. Needs assessments are performed to determine what systems are candidates for automation, whether standard hardware and software systems are available to meet the need, and whether or not the LEA would benefit. Automated financial systems provide accurate, timely, relevant information and conform to all accounting standards. The systems are designed to serve all of the various users inside and outside the LEA. Employees receive appropriate training and supervision in system operation. Appropriate internal controls are instituted and reviewed periodically.</p>	3	3	4	3	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
15.7	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Hardware and software purchases conform to existing technology standards. Standards for network equipment, servers, computers, copiers, printers, fax machines, and all other technology assets are defined and enforced to increase standardization and decrease support costs. Requisitions that contain hardware or software items are forwarded to the technology department for approval before being converted to purchase orders. Requisitions for nonstandard technology items are approved by the information management and Technology Department(s) unless the user is informed that LEA support for nonstandard items will not be available.</p>	2	2	2	2	3	4	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
15.8	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>An updated inventory includes item specification for use in establishing standards for an equipment replacement cycle and rotating out obsolete equipment. Computers and peripheral hardware are replaced based on a schedule. Hardware specifications are evaluated yearly. Corroborating data from work order or help desk system logs is used when this data is available to determine what equipment is most costly to own based on support issues. The total cost of ownership is considered in purchasing decisions.</p>	2	2	2	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2
15.10	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>In order to meet the requirements of both online learning and online student performance assessments, the district has documentation that provides adequate technology to support these needs. Documentation should include sufficient bandwidth to each school site, internal local network infrastructure capacity, electronic devices which meet the published minimum standards for online student assessments, and an adequate number of devices to allow testing of all students within the prescribed amount of time.</p>	2	6	4	6	7	8	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	9



Financial Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
15.11	<b>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</b> The LEA optimizes funding of various types of technology throughout the organization by effective utilization of available Federal E-rate discounts, the California Teleconnect fund, and other available discount programs and funding sources to reduce costs for various technology expenditures.	2	3	4	3	3	4	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
16.1	<b>LEGAL STANDARD – MAINTENANCE AND OPERATIONS FISCAL CONTROLS</b> Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.	1	0	0	1	0	0	0	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	0	0
17.1	<b>PROFESSIONAL STANDARD – FOOD SERVICE FISCAL CONTROLS</b> To accurately record transactions and ensure the accuracy of financial statements for the cafeteria fund in accordance with GAAP, the LEA has purchasing and warehousing procedures to ensure that these requirements are met.	1	0	0	0	2	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
20.1	<b>PROFESSIONAL STANDARD – SPECIAL EDUCATION</b> The LEA actively takes measures to contain the cost of special education services while providing an appropriate level of quality instructional and pupil services to special education students. The LEA meets the criteria for the maintenance of effort requirement.	1	1	3	0	0	0	0	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	0	2



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
21.1 PROFESSIONAL STANDARD – TRANSPORTATION The LEA actively takes measures to control the cost of transportation services and limit the contribution from the general fund while providing safe and reliable transportation to the students.	2	2	1	1	0	0	0	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	0	0
22.1 LEGAL STANDARD – RISK MANAGEMENT – OTHER POST-EMPLOYMENT BENEFITS LEAs that provide health and welfare benefits for employees upon their retirement, and those benefits will continue past the age of 65, shall provide the board an annual report of actual accrued but unfunded costs of those benefits. An actuarial report should be performed every three years. (EC 41240)	0	0	0	0	0	6	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	9



Financial Management Standards	July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
22.2 PROFESSIONAL STANDARD – RISK MANAGEMENT – OTHER POST EMPLOYMENT BENEFITS The LEA has a comprehensive risk-management program that monitors the various aspects of risk management including workers' compensation, property and liability insurance, and maintains the financial well being of the LEA. In response to GASB requirements, the LEA has completed recent actuarial reports for workers' compensation and property and liability. The actuarial assumptions properly track to the LEA's budget assumptions and include the benefits being provided under existing plans.	4	4	0	2	3	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
<b>Collective Average Rating</b>	<b>1.19</b>	<b>1.33</b>	<b>1.95</b>	<b>2.16</b>	<b>2.44</b>	<b>3.28</b>	<b>3.81</b>	<b>—</b>	<b>3.70</b>	<b>4.26</b>







# Facilities Management







## 1.1 School Safety

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### Legal Standard

The LEA has adopted policies and regulations and implemented written plans describing procedures to be followed in case of emergency, in accordance with required regulations. All school administrators are conversant with these policies and procedures. (EC 32001-32290, 35295-35297, 46390-46392, 49505; GC 3100, 8607; CCR Title 5, Section 550, Section 560; Title 8, Section 3220; Title 19, Section 2400)

### Findings

1. The district last revised and adopted BP 0400-Comprehensive Plans on September 19, 2018. The district also revised and adopted BP and AR 0450-Comprehensive Safety Plan and BP and AR 3516-Emergency and Disaster Preparedness Plan, on April 17, 2019, and AR 3516.3-Earthquake Emergency Procedure System, on February 20, 2019.
2. AR 3516.1-Fire Drills, AR 3516.2-Bomb Threats and AR-3516.5 Emergency Schedules, were last updated on August 4, 2014.
3. The Comprehensive School Safety plans were available at each of the school sites. The plans were in the main office of each campus and had been approved by their respective SSC and the county administrator. The Comprehensive School Safety plans were also posted and available on the district website and had been updated since the last FCMAT review to include pandemic safety guidelines.
4. Surveys of sites indicated they had all conducted on-site earthquake and fire drills, except for Morningside High School, which did not hold monthly fire drills. Most held their drills on the days indicated in the Emergency Drill schedules in their Comprehensive School Safety plans. All schools, except Inglewood High School, Payne Elementary School, and Inglewood Adult School, had fire and earthquake drill schedules in their safety plans.
5. All school sites participated in the latest annual statewide Great California Shake Out Earthquake Drill on October 21, 2021.
6. Many of the school sites had emergency telephone numbers and evacuation route maps posted in administrative offices and classrooms. Schools with missing evacuation maps and emergency telephone number information sheets included Bennett-Kew, Oak Street, Hudnall, Kelso, Payne, and Parent elementary schools, as well as Crozier Middle School, Inglewood Continuation High School, and Inglewood High School. FCMAT found that some rooms had evacuation maps and emergency telephone numbers with outdated, missing, or incorrect information, or this information was posted in unusual locations.



For example, some maps did not clearly indicate the evacuation route, or indicated a route through an existing wall without a door to the outside.

7. The district no longer has an active District Safety Committee. According to the district website and documentation reviewed, the last meeting held by the districtwide safety committee was in February 2021. FCMAT surveyed and interviewed site principals, some of whom indicated they had created school site safety committees at their respective schools and discussed the school site safety plans regularly.
8. All site principals reported that their SSCs had each held a meeting to approve their respective Comprehensive School Safety plans. Evidence of those meetings, including minutes and agendas, is in the final pages of each of their respective Comprehensive School Safety plans.
9. Since the last review, the district hired an interim police chief who has taken a leadership role in the school site safety planning. This individual coordinated the updating and development of each of the Comprehensive School Safety plans throughout the district and conducted districtwide safety surveys to identify safety concerns to help in safety planning.
10. Site administrators consistently stated that they had participated in district-level meetings that discussed the district safety plan and received professional learning on preparing the Comprehensive School Safety plans and the proper procedures for developing and approving the plans.
11. The district provided professional learning sessions to all employees, which included workplace safety and pandemic related safety training. The district also provided various types of online safety training through the Keenan Safe Schools website provided by the district's property and liability joint powers authority (JPA).
12. The district has filled the position of deputy chief maintenance and operations officer with a permanent employee. This position provides key leadership in addressing facility related emergency and safety issues.

## **Recommendations for Recovery**

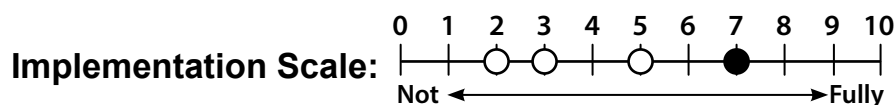
1. The district should regularly review board policies and administrative regulations and update as warranted to ensure they are still compliant, accurate and applicable. ARs 3516.1, 3516.2 and 3516.5, last updated in 2014, should be reviewed and updated if needed.
2. The district should continue to annually update and approve the Comprehensive School Safety plans, and they should be made available for access, at a minimum, in each school site office and be posted on the district website.



3. The district should continue to perform regular fire and earthquake drills at each site and include the schedule for the drills in their respective Comprehensive School Safety Plan. The district should require all school sites to provide evidence to the district office ensuring fire drills are performed.
4. The district should continue to regularly inspect all rooms where students or staff may be present to ensure they have posted accurate evacuation route maps and emergency telephone numbers. The information should be posted in a location where it can be easily seen by all students and staff members in an emergency, and all evacuation maps should clearly and accurately identify the route to be taken in an emergency.
5. The district should consider reinstating the districtwide safety committee, the cornerstone for the development of districtwide safety and emergency planning.
6. The district should continue to require evidence of compliance from each school site that SSC meeting agendas are posted, and minutes are recorded approving the school safety plan.
7. The district should continue to support and expand the role of the interim police chief in their leadership effort regarding the promotion and coordination of school site safety. The district should consider making the position permanent.
8. The district should continue to provide all employees with professional learning that includes the most recent pandemic related protocols, as well as emergency preparedness on districtwide staff development days.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	5
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	7
July 2022 Rating:	7





## 1.3 School Safety

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### Legal Standard

The LEA has developed a comprehensive safety plan that includes adequate measures to protect people and property. (EC 32020, 32211, 32228-32228.5, 35294.10-35294.15)

### Findings

1. The district BP 0450-Comprehensive Safety Plan, was last revised in April 2019. It requires each SSC to develop a Comprehensive School Safety Plan relevant to the needs and resources of that school. California Education Code (Sections 32280-32289.5) outlines the requirements for schools, operating any kindergarten and any grades one to 12, inclusive, in writing and developing a school safety plan relevant to the needs and resources of that school. FCMAT verified that all sites have developed a Comprehensive School Safety Plan, approved them through their respective SSCs in accordance with SB 187, SB 334 and AB 1747, and had them readily accessible on site and posted online.
2. AR 3516-Emergency and Disaster Preparedness Plan was last updated in April 2019, and outlines plan requirements for fire drills (AR 3516.1), bomb threats (AR 3516.2), earthquake emergency procedures (AR 3516.3) and emergency schedules (BP 3516.5) at school sites. Except for Morningside High School, site principals reported they routinely scheduled and performed fire drills and earthquake drills in accordance with board policy.
3. Except for Payne Elementary, site principals reported that fire alarm systems operated correctly. The Payne Elementary system required separate alarms to be pulled at two different locations on the campus for the alarm to be heard throughout the campus. Worthington Elementary has only one pull station located in the school office, raising concern about whether the alarm could be triggered in a timely manner, if at all, in an evacuation.
4. FCMAT found the public address system at Highland Elementary not fully functioning and could not be heard throughout the entire campus. Similarly, Inglewood High School's public address system remains partially operable in that it cannot be heard throughout the entire campus to provide schoolwide communications and alerts in a lockdown or evacuation.
5. Education Code 32282 requires all safety-related plans and materials to be readily available for inspection by the public. Each of the school sites had current school safety plans that were readily available for viewing in the school office and were posted on the district website.
6. At each of the school sites visited, FCMAT inspected a sample of fire extinguisher tags that indicated they were inspected in September 2021. The fire extinguishers should be checked regularly for pressure; however, tags at all sites except one were not initialed to indicate they had been examined other than the annual inspection. The district continues to maintain an account with an outside vendor for central station monitoring, fire



extinguisher recharging, emergency lighting and kitchen hood extinguishers districtwide to comply with fire marshal inspections and Williams Act requirements.

7. All school sites have a primary single point for campus entry. Schools had staff stationed at the front entrances to ensure visitors were checked for COVID-19 symptoms and a visitor log was maintained.

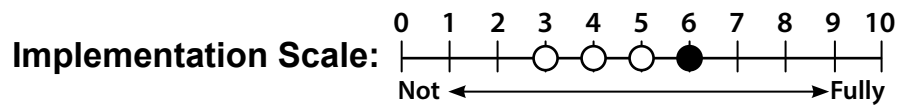
## **Recommendations for Recovery**

1. The district should continue to update and maintain its Comprehensive School Safety plans according to BP 0450.
2. The district should continue to schedule and perform fire drills and earthquake evacuation drills in accordance with AR 3516.1 and BP 0450, respectively. The district should require school sites to provide their updated fire drill schedules at the beginning of each fiscal year and should require monthly reporting by the school sites verifying the drills were completed.
3. The district should evaluate and address the two independent fire alarm systems at Payne Elementary and the accessibility of the single pull station at Worthington Elementary.
4. The district should evaluate and repair the partially operable public-address systems at Highland Elementary and Inglewood High School so that the systems can be heard in all areas of the campus.
5. The district should continue to annually inspect the fire extinguishers throughout the district.
6. The district should ensure fire extinguishers have been checked monthly and the tag is initialed by the person who does the check. Site staff should be trained to perform and record these monthly fire extinguisher visual inspections for proper pressure. Site staff should immediately notify the site principal and the deputy chief maintenance and operations officer of any fire extinguishers that are out of date, have missing pins, tags or are in any way potentially not fully operable.
7. The district should continue to use a single point of entry and maintain the use of visitor sign-in logs for each of its school sites. The use of visitor identification badges should be considered at all school sites.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 1.8 School Safety

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### Legal Standard

School premises are sanitary, neat, clean and free from conditions that would create a fire or life hazard. (CCR Title 5, Section 630)

### Findings

1. The school facilities visited by FCMAT were relatively clean and free of debris and conditions that would create a fire or life hazard. At various sites visited by FCMAT, trash and other debris was in less-traveled, but accessible locations.
2. Restroom facilities inspected by FCMAT at all sites were free of debris and conditions that would create fire or life hazard. Missing or broken soap dispensers were at Morningside High School, Payne Elementary and Centinela Elementary along with some broken sinks at Centinela Elementary. Although the restrooms visited by FCMAT were generally clean, some had aging and worn flooring and stall partitions, and staff at several sites indicated they had concerns about the restroom being cleaned regularly. Throughout the district, bathrooms no longer appear to be periodically and consistently inspected throughout the day. Some student restroom facilities at school sites visited by FCMAT were locked and were not inspected.
3. Many staff and community members reported that overall cleanliness and appearance of school sites greatly improved in the past year.
4. All kitchen facilities visited by FCMAT were found to be clean, and the equipment appeared to be in good working condition.
5. Annual fire extinguisher inspections had been completed at all sites and most by an outside vendor. The fire extinguishers in the temporary classrooms at Oak Street Elementary had not been inspected. Fire extinguishers should also be checked regularly for pressure, but only one site, Warren Lane, contained any evidence of monthly fire extinguisher checks by district employees as demonstrated by the written initials located on the back of the inspection tags.
6. No evidence was provided to confirm that the fire alarm system at Kelso Elementary had been tested in the past year, but the staff reported that the system functioned properly. Information provided to FCMAT indicated that the Centinela Elementary fire alarm system was tested and was not fully functioning; however, during site visits, the principal stated it worked correctly.
7. No playground inspections were recorded during the period under review; however, some playground repairs and improvements were completed to correct some safety concerns. The school site playgrounds were last inspected by Poms and Associates in 2017. The latest report update provided in April 2019 identified numerous outstanding issues that remained and needed to be addressed.



8. District practice is that custodial personnel conduct regular inspections on their respective campuses to ensure that all appropriate doors are secured, and potential hazards are properly identified and addressed.
9. No custodians were evaluated in the past year. Site principals are responsible for performing custodial evaluations in conjunction with the deputy chief maintenance and operations officer and custodial supervisor. The principals interviewed by FCMAT stated they have daily oversight of the custodians.
10. All sites had current SDS binders except for Inglewood High School, where they had an SDS binder containing outdated information.
11. SDS training for custodial employees or other staff members had not occurred during this review period.

## **Recommendations for Recovery**

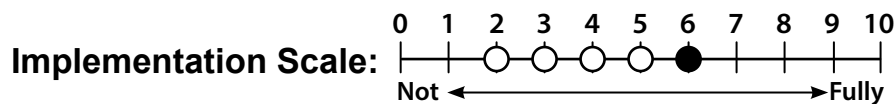
1. The district should continue to work to improve the cleanliness of its campuses. Custodial staff should continue to be trained and held accountable to more diligently inspect accessible, but hidden areas for removal of trash and debris.
2. The district should continue efforts to always maintain the cleanliness of its school site restroom facilities. Custodial staff should be held accountable to maintain the cleanliness of restroom facilities throughout the day. Periodic restroom inspections should be reestablished throughout the day using the daily inspection form at school sites to ensure they contain all necessary product and working dispensers to include toilet paper, soap, sanitizer, and toilet seat covers.
3. The district should have fire systems tested annually at all sites and repairs made as necessary to ensure full functionality.
4. The district should continue to perform its annual fire extinguisher inspections and reestablish monthly checks of the classroom fire extinguishers by district personnel. The district should ensure fire extinguishers throughout the district are professionally inspected, including those in the temporary classrooms at Oak Street Elementary.
5. The district should conduct annual playground safety inspections through the certified playground safety audits conducted by the district's property and liability insurance provider ASCIP and correct any deficiencies identified.
6. The district should complete its annual custodial evaluations, with the site administrator having primary responsibility for their completion, and the deputy chief maintenance and operations officer and custodial supervisor providing input.



7. The district should continue regular inspections by its custodial personnel on their respective campuses to ensure that all appropriate doors are secured, and potential hazards are properly identified and addressed. The district should consider having site lead custodians visit other sites to help identify issues that have gone unnoticed and to learn from one another.
8. The district should ensure up-to-date SDS binders are maintained and accessible at each of its school sites, and that all necessary staff members know their location and are well versed in their use.
9. The district should continue to move forward with facility improvement plans to address site safety and habitability issues that are beyond the scope of regular and routine maintenance. Plans should include the repair or updating of aging student restroom facilities in the district, particularly floors and stall partitions.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	3
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 1.9 School Safety

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### Legal Standard

The LEA complies with Injury and Illness Prevention Program (IIPP) requirements. (CCR Title 8, Section 3203)

### Findings

1. BP and AR 4257-Employee Safety and BP 4257.1-Work Related Injuries were last updated in August 2014 and require the superintendent or designee to establish and implement a written IIPP in accordance with Labor Code Section 6401.7. AR 4257.1-Work Related Injuries was last updated in February 2019, and AR 4257.2-Ergonomics was last updated in April 2019. These policies delegate authority to the superintendent or designee to establish and implement a written IIPP in accordance with law.
2. The district has posted its IIPP on the district website, and it has been updated since the last FCMAT review. The document was developed in coordination with the district's property and liability insurance JPA.
3. The district held one districtwide professional learning day on August 21, 2021, where safety training, including some specific areas covered under the IIPP, was provided.
4. The district offers its ongoing and annual workplace injury and illness prevention training to its employees through a web-based application from Keenan Safe Schools. The program provides training specifically related to the requirements outlined in the IIPP, such as workplace injury prevention and workplace safety. The program also maintains a record of all annual training completed by district employees.
5. The district had previously established a districtwide safety committee, but it has not held any meetings since February 2021.

### Recommendations for Recovery

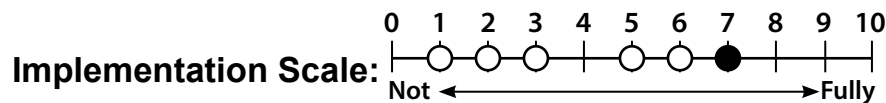
1. The district should continue to update the IIPP annually and ensure that it includes the appropriate identification of contacts, documentation of trainings and inspections, the most current district applicable information and that it is readily available to employees and the public.
2. The district should continue to post its most recent Injury and Illness Prevention Plan on the district webpage and notify all employees of its availability.
3. The district should continue to provide, at a minimum, annual districtwide staff development that includes safety training including IIPP. Additionally, the district should ensure IIPP training to all new employees, employees new to their job assignment, and to refresh the existing employees' awareness of safety procedures.



4. The district should continue to provide annual employee training as related to the requirements of the IIPP. The district should continue to closely monitor the employee training records to ensure the training required of each employee is completed in a timely manner.
5. The district should consider the reestablishment of a districtwide safety committee and have the IIPP regularly reviewed as part of the committee's duties.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	3
July 2016 Rating:	2
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	7





## 1.15 School Safety

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### Legal Standard

The LEA maintains updated Material Safety Data Sheets (MSDS) for all required products. (LC 6360-6363; CCR Title 8, Section 5194)

The global harmonization system was developed in 1992 and slowly implemented throughout the world during the past 20 years. Implementation in the United States occurred in 2012 and has replaced the MSDS system with the SDS system. Nevertheless, the SDS system continues to utilize a readily available binder for providing safety information on all custodial cleaning products.

### Findings

1. The district last updated BP 3514.1-Hazardous Substances on April 17, 2019. The board policy reflects current requirements and is posted on the district website.
2. FCMAT found all sites had up-to-date SDS binders, except for Inglewood High School, which had an SDS binder with some outdated information. The SDS binders were consistently located in the school offices at each school site.
3. The district provided FCMAT no evidence of any training regarding the use of the SDS binder occurring since the last review.
4. In 2019 the district developed a comprehensive Hazard Communications Program document to provide information and guidelines for all employees who use hazardous materials. The program outlines the responsibilities of employees, site administrators, and district-level supervisors. FCMAT could not determine if this program remains in effect and is used by the district.

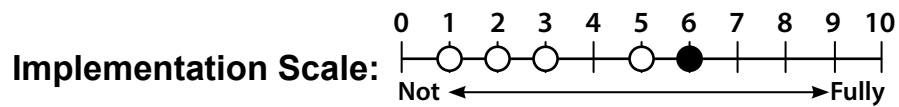
### Recommendations for Recovery

1. The district should continue to maintain its BP 3514.1-Hazardous Substances and update as needed.
2. The district should continue to review its SDS binders as needed to ensure all sites have up-to-date SDS binders, the binders are stored in a readily accessible location, and all site personnel are aware of their location.
3. The district should provide annual training in the use of the SDS binder, the information they contain and their location.
4. The district should review, revise and, if necessary, reestablish its Hazard Communications Program to ensure there is a safety program that discusses the specific safety protocols and responsibilities associated with the use of hazardous materials and SDS, including the addition of SDS training dates. The district should also consider adding SDS use and accessibility information to the IUSD Custodial Handbook.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	3
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 1.16 School Safety

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### Professional Standard

The LEA has a documented process for issuing and retrieving master and sub-master keys. All administrators follow a standard organizationwide process for issuing keys to and retrieving keys from employees.

### Findings

1. The district last updated AR 3515-Campus Security, in August 2014, which specifies the following:

All keys used in a school shall be the responsibility of the principal or designee. Keys shall be issued only to those employees who regularly need a key in order to carry out normal activities of their position. The principal or designee shall create a key control system with a record of each key assigned and room(s) or building(s) which the key opens. Keys shall be used only by authorized employees and shall never be loaned to students. The master key shall not be loaned. The person issued a key shall be responsible for its safekeeping. The duplication of school keys is prohibited. If a key is lost, the person responsible shall immediately report the loss to the principal or designee and shall pay for a replacement key.

2. The district employs a deputy chief maintenance and operations officer position. According to the job description and interviews, this position is responsible for issuing and controlling keys throughout the district and shares that responsibility with the maintenance supervisor. Information from the sites is collected and maintained regarding key inventory and issuances.
3. In an interview with FCMAT, the CBO reported that the district is developing a request for proposal (RFP) to develop and implement a new districtwide key and lock system. No additional information was provided about which type of key system was under consideration, no documentation was provided to indicate the status of this process, and other district employees were not aware of the status.
4. All site administrators reported that the process, forms, and replacement of lost keys has been implemented and is consistent with board policy and indicated to FCMAT that their sites maintained a system to check out and return all keys assigned to teachers, substitutes and other staff. All keys assigned to teaching and classified staff are relinquished to the principal on the last day of school. No keys are authorized to be maintained by staff members on summer break.
5. The district uses independent contractors to help repair, issue and ensure accountability for keys and locks. All keys are issued to sites from the central operations office. Even after a new lock is installed, keys are issued by the central operations office and not by the independent contractors who performed the installation.



6. The district has previously attempted to standardize the implementation of all new locks and keys with the Sargent system; however, little or no progress has been made, and a wide variety of locks and keys continues to be used throughout the district. Because locks and key systems lack uniformity, the district cannot issue a specific master or submaster key that is operable at all sites. Some newer sites utilizing the Sargent system can issue master and submaster keys to enable site access.
7. The district has not yet fully implemented a standardized lock system for the district, or for individual campuses, and as a result, FCMAT continues to observe many campus administrative and custodial staff carrying a large number of keys to access all locked areas at their sites. FCMAT again observed instances in which staff members including administration, maintenance and custodial staff could not open doors or locks because they did not have the appropriate key readily available.
8. A review of the district work orders over the past year indicate many requests for new and additional keys throughout the district.

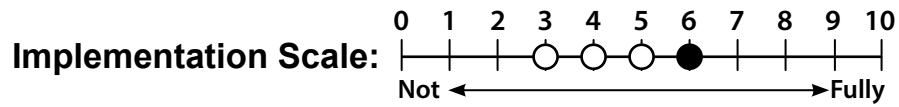
## **Recommendations for Recovery**

1. The district should review and revise its board policies and administrative regulations to ensure they are applicable and accurate, including the updating of current position titles and responsibilities.
2. The sites should continue to forward to the appropriate district authority a copy of the key inventory to include specific information on issued keys such as the purpose, the name of the person who was issued the key, and the individual who issued it.
3. The district should prioritize and implement the use of its district established standard lock and key system for all facilities and develop a plan to systematically replace the older lock systems at the sites with the new system. This will help eliminate the large number of keys required by site administrative and custodial staff.
4. The district should ensure that all site administrators always have the proper keys to access every room, building, or gate on their campus. School site administrative and custodial staff should perform an annual walk-through inspection of their campuses to check all gates and doors to ensure they have the proper keys to access all areas of the campus.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 1.18 School Safety

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### Professional Standard

Outside lighting is properly placed and is monitored periodically to ensure that it functions and is adequate to ensure safety during evening activities for students, staff and the public.

### Findings

1. The district does not have board policy or facilities standards that specifically addresses outside lighting. AR 3515-Campus Security was last updated in August 2014 and outlines strategies that include a risk management analysis of each campus' security system, lighting system, and fencing. In November 2016, the district developed a document titled District Standards, which includes section 265619 outlining construction requirements for exterior lighting.
2. According to the work order summary provided by the district for this review period, outdoor/exterior lighting was repaired at Parent Elementary in September 2021, Morningside High School and Hudnall Elementary in November 2021, and at Warren Lane Elementary, the special education building, Highland Elementary, Inglewood High School, and Oak Street Elementary in January 2022. The district was working on repairing additional exterior lighting at Hudnall Elementary at the time of FCMAT's visit. The district has also recently installed new exterior lighting over the temporary classrooms at Oak Street Elementary.
3. The Facilities, Maintenance, Operations and Transportation Department continues to use an internal document known as the School Inspection Report to assess school site facility conditions; however, no inspections were conducted during the review period. The report does not assess exterior lighting conditions.
4. All sites had exterior lighting that appeared to be in working order, and no complaints or concerns were expressed in any of the interviews regarding deficiencies in exterior lighting.

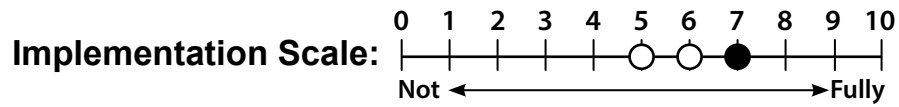
### Recommendations for Recovery

1. The district should consider developing written standards for exterior campus lighting as part of AR 3515. The district should continue to include construction requirements for exterior lighting in its District Standards document.
2. The district should continue to repair and improve exterior lighting regularly as requested through its work order system.
3. The district should use the School Inspection Report monthly at each site and update the form to include an inspection item to evaluate exterior lighting.
4. The district should continue to evaluate the outside lighting during evening hours at all sites and provide temporary lighting as needed to ensure adequate exterior lighting levels and safety are maintained.



## Standard Partially Implemented

July 2013 Rating:	5
July 2014 Rating:	5
July 2015 Rating:	6
July 2016 Rating:	5
July 2017 Rating:	5
July 2018 Rating:	5
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	7





## 1.20 School Safety

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### Professional Standard

The LEA maintains a comprehensive employee safety program. Employees are made aware of the LEA's safety program, and the LEA provides in-service training to employees on the program's requirements.

### Findings

1. BP and AR 4157 were last updated in August 2014 and require the superintendent or designee to promote employee safety and correct any unsafe work practices through education and enforcement. The district provided documentation that represented an operative and executed employee safety plan, and Comprehensive School Safety plans were available and accessible at all school sites.
2. The district provided mandatory virtual training on workplace safety to all classified employees in August 2021. The training was open to other staff members and classifications as well if they wished to participate. The district also provides ongoing workplace safety training for all employees through the online Keenan Safe Schools training program available to the district from its property and liability JPA.
3. The district no longer has an active districtwide safety committee. The committee consisting of members of the district leadership team, labor union leaders, and other district employees last met in February 2021.

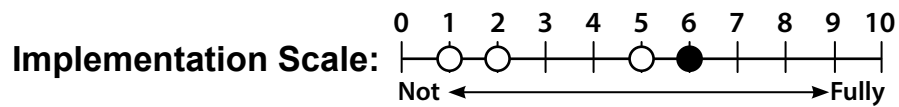
### Recommendations for Recovery

1. The district should continue to ensure that all employees, including substitutes, receive safety training according to the safety plan and requirements for each position, job title, and school site. Training records should continue to be maintained and kept in a single location so they can be reviewed regularly to ensure actions are completed according to the district safety plan, board policy requirements, and to coordinate training activities between departments.
2. The district should provide districtwide workplace safety training to all employees annually. The district should also continue to provide ongoing workplace safety training for all employees through the online Keenan Safe Schools training program.
3. The district should reconstitute its districtwide safety committee to review and communicate district safety issues and concerns and provide direction to staff regarding urgent or important safety concerns.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	5
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 2.2 Facility Planning

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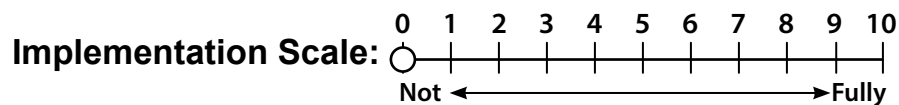
### Legal Standard

The LEA seeks and obtains waivers from the State Allocation Board (SAB) for continued use of any nonconforming facilities. (EC 17284-17284.5)

This standard is no longer applicable under current law and will be eliminated from the evaluation process and scoring rubric.

### Standard Not Applicable

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	N/A
July 2016 Rating:	N/A
July 2017 Rating:	N/A
July 2018 Rating:	N/A
July 2019 Rating:	N/A
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	N/A
July 2022 Rating:	N/A





## 2.3 Facility Planning

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### Legal Standard

The LEA has established and uses a selection process to choose licensed architectural/engineering services. (GC 4525-4526)

### Findings

1. BP and AR 7140 on the selection of architectural and engineering services were adopted in August 2014 and require the superintendent or designee to devise a competitive process for choosing architects and structural engineers that is based on demonstrated competence and on the professional qualifications necessary for the satisfactory performance of the services required.
2. Over the past several years, the district CBO position and facilities management staff have changed resulting in the loss of valuable historical knowledge and experience needed for the selection of architectural consultants and determining their abilities.
3. The district issued a new request for statement of qualifications (RFQ) dated March 29, 2021, for architectural services related to Measure GG, Measure I, modernization, and new future construction projects. The RFQ for architectural services was due by April 14, 2021. The district used the RFQ to create a new pool of architectural consultants and is using this list to enter into new contracts. This RFQ may be annually approved by the school board with a limit of five years, so it may be used until April 13, 2026. In addition, the current RFQ includes project services such as working with the district's demographic consultant to create a well-developed plan, preparing a long-range facilities master plan and educational specifications.
4. The district's new RFQ did not adequately state new potential projects, but defined the architects will be required to make their expert assessments of the district's facilities and be a part of developing the projects that will meet the district's needs and priorities.
5. A facilities master plan is ideally defined by needs according to three years, five to seven years, and 10 years while documenting the modernization eligible (25 year) projects. Architects assigned to the district's Facilities Master Plan will first need to develop a short-term master plan in order help the district develop a long-term facilities master plan with prioritization of projects throughout the term. An example of how this plan will need to be implemented over the years is Inglewood High School. Inglewood High School may require a multiphase construction process while concurrently addressing the needs of the district. Due to its uniqueness and community and historical significance, Inglewood High School will require an experienced architectural designer. The architectural firm should then create the district's project list and support the district in meeting the new requirements as identified as well as establishing a plan to meet the district's multiterm Facilities Master Plan objectives.



6. The district RFQ includes detailed educational specifications for each school level with a direction to the selected architectural pool to include the design services necessary for the final defined work. The new RFQ includes complete services needed and a defined fee for services schedule.
7. The district has employed a deputy chief maintenance and operations officer who has made significant progress within the last year to improve facilities. To develop its own internal capacity, the district staff responsible for facilities services needs training. Organizations such as the CASBO and Coalition for Adequate School Housing (CASH) provide education and expertise on facilities, maintenance, operations, and state funding topics. In addition, the district should network with other school districts and learn from their experiences in similar projects.
8. The district developed building standard specifications from late 2016 to early 2017, and it appears that any reevaluation has not been considered or completed. Ongoing reevaluation should occur at least every two years as building standard specifications change regularly, or even more frequently when major changes occur such as specifications for technology, learning environment, safety, etc. The best practice is to establish a committee of knowledgeable district staff (such as the deputy chief maintenance and operations officer, maintenance staff experienced in the specific trade involved, other appropriate administrative and finance staff, and teachers) to review and recommend changes to the standard specifications ensuring they are up to date and compliant with construction industry standards and education standards. The committee would review and edit the standard specifications in consideration of the district needs and product capabilities. The committee would then communicate recommendations to the board/county administrator for approval.
9. The district has completed or is in the process of completing many projects that the district had identified as priority projects where work would be performed using bond and LAWA impact mitigation funds. Those priority projects were at the Bennett-Kew Elementary, Centinela Elementary, Woodworth-Monroe Elementary, Payne Elementary, Oak Elementary and Morningside and Inglewood High School sites. The balance of Measure GG funds and new bond funds under Measure I have been allocated for the other projects that are defined in the Inglewood Unified School District MOT 2021-2022 Current Projects List Report. New projects that are identified in the new Facilities Master Plan may be added as allowable and appropriate according to bond language and interim housing while LAWA funds are used in complement to perform the sound mitigation. The district still uses established piggybacked bids for relocatable classrooms to provide for interim housing.

## **Recommendations for Recovery**

1. The district should continue to follow the process outlined in BP 7140 for selecting architectural services on future district projects. This policy should be revisited regularly and revised as necessary to ensure it meets the district's needs and the industry best practices.

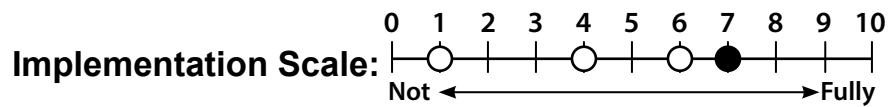


2. The district should continue to use its new RFQ process to ensure selection of the most qualified architectural firm(s), including all supporting consultants, to create a plan for the district's projects and help the district meet the requirements as identified and established by the district.
3. The new RFQ should not be the sole criteria for determining architectural services. Special projects may require architects with different skills, special knowledge, and experience. When this occurs, include a well-defined and complete educational specification on each project independently and a well-defined description to request appropriate architectural services. When significantly complex projects are determined, such as those at Inglewood High School, the present RFQ list of qualified architectural consultants may not meet project needs, and the district should consider developing a new separate project specific RFQ identifying the actual needs required.
4. When project specific specifications are needed, the district should also consider issuing a separate RFQ for architectural services. An architect who prepares detailed educational specifications may be considered ineligible to provide services for the related projects. The district should seek advice from its legal counsel about a possible conflict of interest if it wants to use the same architect for design specifications and to provide services for those projects.
5. District staff should seek education and experience in selecting professional services from education specific organizations such as the CASBO and CASH. In addition, the district should communicate with and seek assistance from other school districts and learn from their experiences. Although the deputy chief maintenance and operations officer is very experienced, this position should continue professional learning. Until sufficient experience is acquired, the district staff should include personnel from other school districts trained with the architectural selection process to assist with interviews for selection of qualified architectural consultants. Outside experienced staff in architectural selection are a valuable resource to help determine proper architectural candidates' experience with the services needed for each of the district's projects.
6. The district should evaluate and consider updating the building standard specifications. These standard specifications should be reviewed, edited and updated at least every two years, or more frequently if major developments occur. In consideration of cleaning and wear, maintenance and custodial staff should have input on materials specified.
7. Once standards are completely evaluated, updated and adopted, the district should establish a consistent committee of experienced evaluators to continue to review and make recommendations to the standard specifications.
8. The district should continue to research piggyback pricing at least annually to ensure it uses the best value bids. The district should obtain a legal review of all piggyback bids before use to ensure compliance, legality, and district protection.



## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	4
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	7





## 2.6 Facility Planning

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### Professional Standard

The LEA has a long-range school facilities master plan that has been updated in the last two years and includes an annual capital planning budget.

### Findings

1. BP 7110 states the following:

The Board of Education recognizes the importance of long-range planning for school facilities in order to address changes in student enrollment and in the district's educational program needs. The Superintendent or designee shall develop, for Board approval, a master plan for district facilities which describes the district's anticipated short- and long-term facilities needs and priorities.

The district's facilities master plan shall be based on an assessment of the condition and adequacy of existing facilities, a projection of future enrollments, and alignment of facilities with the district's vision for the instructional program.

2. The district last revised BP 7110 for developing a facilities master plan in February 2019. The policy requires the plan to be based on an assessment of the condition and adequacy of existing facilities, projection of future enrollments and alignment of facilities with the district's vision for the instructional program.
3. The Facilities Master Plan was last developed, and county administrator approved, at the district's November 18, 2015, regular board meeting. A draft update to the Facilities Master Plan was developed in November 2018, but was never approved. The district recently hired a consultant to develop a 2022 Facilities Master Plan. The new plan will take time and will be influenced by the school consolidation/closure process and decisions. The plan should be based on the district's future instructional goals and allow the current administration to create a new responsive capital-planning timeline and budget for facilities expenditures. This document is the next step to address identified community concerns and involvement and should include new projects and funding such as those included in the recently approved Measure I.
4. As enrollment continues to decline, the district's facilities underuse continues to grow. The number of classrooms needed to house the district's total student enrollment is still significantly less than what the district maintains. This excess in facilities is most evident at the high schools. Most of these excess facilities are old and in disrepair, and the district would benefit from removing them. Recent progress was found at Morningside High School as modernization of the classroom buildings has progressed and were near completion at the time of FCMAT's visit; however, the district is still faced with the need for removal of unused classrooms/buildings. At Inglewood High School, the district remains faced with maintaining, abandoning and/or demolishing facilities as well. Some interviews with staff indicated a plan for demolition and rebuild of certain areas at



Inglewood High School. Until the district matches its facilities to student enrollment, it will need to continue maintaining all its facilities on a maintenance budget that would be considered marginally adequate for a district with significantly fewer facilities.

5. The district began the process of downsizing its facilities in 2019 with the removal or demolition of excess portable classrooms and the combining of Woodworth Elementary and Monroe Middle schools. Discussions regarding the school consolidation/closure process have happened and were brought to FCMAT's attention as an ongoing consideration by the district, yet no final decisions were made at the time of FCMAT's fieldwork.
6. Some progress has been made on removing dilapidated buildings and/or portable classrooms. FCMAT found this year that two dilapidated portables previously placed at the Payne Elementary site were removed. The district should consider removing dilapidated portable classrooms as a first option during the downsizing process.
7. The district has invested in the repair or modernization of portables at various schools. The district should generally avoid investing in the repair or modernization of portables unless a thorough analysis is completed, the need is determined and this is the best fiscal and operational choice. In general, the district should invest all improvement/modernization monies in modernizing permanent facilities rather than improving facilities that are considered temporary such as portables.
8. The new requirement to place universal transitional kindergarten (UTK) on school campuses was not discussed, but funding for UTK facilities could be a way to replace old dilapidated portable classrooms with new permanent modular buildings on a concrete foundation. This process could put UTK students in a 50- to 75-year life span classroom facility.
9. The district has proceeded with the development of a facilities needs assessment and an anticipated timeline for a 2022 Facilities Master Plan. With the information from the school consolidation/closure process, the facilities needs assessment and the 2022 Facilities Master Plan, future decisions may be prioritized as needed.
10. FCMAT's review of information provided to the district's CBOC, information from staff interviews, and a review of actual construction projects during site visits show that the district is continuing with facility improvements. However, FCMAT interviews indicated that communication with the committee needs improvement. The committee's review focused primarily on Measure GG and did not include discussion about Measure I in this review period.
11. During the 2019 FCMAT interviews, the district commented that Morningside High School's athletic facilities should be updated to world-class status. During this year's site visit, FCMAT observed campus improvements at the gymnasium, pool and many other areas. There were no further discussions about other athletic facility improvements in this year's review and inspection. Significant improvements have been made to facilities to draw high school students back to the district, possibly increasing student-driven funding.



12. The last review noted that LAWA had notified the district of \$40 million in allocated funds that must be expended. In response, the district expedited projects and added some at sites, such as Oak Street Elementary, that were eligible for the sound mitigation funds. As of January 2022, a balance of \$2,995,550 is still available in LAWA funds. The projects information provided to FCMAT does not include other upcoming sound mitigation projects.
13. The district retained a vendor to perform a demographic study and an asset management study. The demographic study was completed January 25, 2022, but the asset management study was discontinued because of costs and because no new information was submitted by the district.

## **Recommendations for Recovery**

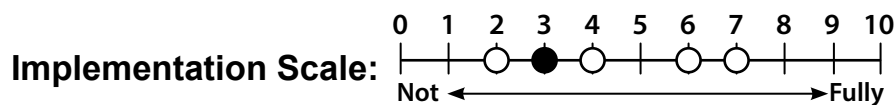
1. The district should regularly review and update BP 7110 as needed to ensure it meets the districts needs and remains compliant to current law and best practices.
2. The district should review, revise, update and adopt its Facilities Master Plan and continue to do so every other year. When developing the Facilities Master Plan, the district should incorporate a funding component based on the estimated costs of needs and available resources.
3. The district should update its facilities needs assessment and the Facilities Master Plan based on enrollment projections. This plan will help clearly define the district's facilities needs by each attendance boundary and site. The district should use this as a basis in considering the facility capacity needs and determine site specific issues that the district continues to face. To develop a plan of action, use a comprehensive team approach to include district staff and outside consultant(s) to determine existing conditions and district needs along with available funding.
4. The district should continue to recognize and address its excess facilities focusing on temporary structures and include special consideration of its iconic and historic sites.
5. The district should continue removing dilapidated portable classrooms and avoid repairing, modernizing or replacing them during downsizing as well as limiting any leasing of portables to a 59-month period. In addition, the new requirement to place UTK on school campuses could be an opportunity to replace old portable classrooms with new permanent modular classrooms on a concrete foundation.
6. The district should improve communications with the CBOC, including the committee's communication with the county administrator/school board. The district should ensure that the oversight committee includes discussions regarding Measure I.



7. The district should continue implementing the projects outlined in the soundproofing work plan. In doing so, the district should continue to analyze LAWA funding and pursue further eligibility of school sites in future LAWA funding sources. In addition, the district should coordinate the sound mitigation work with other district projects and funding sources.
8. The district should continuously revise the soundproofing work plan as new projects are approved to receive LAWA funds and continue to leverage LAWA funds with available state and Measure I fund sources.
9. The district should continue to follow up with LAWA on any projects previously submitted for reconsideration of funding. The district should consider appealing previously denied LAWA funding projects. If the appeal is successful, future LAWA projects funding could be used to leverage possible 2022 state modernization projects bond funding.
10. The district should continue to ensure the present balance of funds and all future LAWA funds are expended by the established deadlines. The district should ensure an administrator is identified and responsible for tracking LAWA expenditures and meeting deadlines, as determined by LAWA policies and requirements, in a timely manner.
11. The district should use information obtained from the demographic study dated January 25, 2022, to align facilities capacity with its current and projected student enrollment.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	4
July 2015 Rating:	6
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	3





## 2.8 Facility Planning

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### Professional Standard

The LEA has a facility planning committee.

### Findings

1. BP 7110-Facilities Master Plan, last revised February 20, 2019, states in pertinent part the following:

To solicit broad input into the planning process, the Superintendent or designee may establish a facilities advisory committee consisting of staff, parents/guardians, and business, local government, and other community representatives. He/she also shall ensure that the public is informed of the need for construction and modernization of facilities and of the district's plans for facilities.

2. The district formed a District Advisory Committee to perform oversight evaluation of the following:
  - Determine enrollment projections and their impact on surplus space.
  - Inventory the capacity and the conditions of existing facilities.
  - Determine per-student operating cost at each facility.
  - Evaluate specific schools considered for closure.
  - Identify specific new environmental/safety concerns for each site.
  - Determine projected cost-savings for each school considered for closure.
  - Identify housing/transportation options for displaced students.
  - Consider cost benefits of varying property disposition/use options.
  - Recommend transition strategies.
  - Make specific recommendations about specific school sites to the county administrator/board.
3. The District Advisory Committee is to serve in an advisory capacity to the county administrator and be composed of one student, one parent, one classified staff member, one teacher, one facilities representative, one fiscal representative, one education administrator, one community member, one business community and one city government representative.
4. The District Advisory Committee has not met since January 31, 2018, and its last and final report was presented to the then state administrator/advisory board on February 7, 2018.



5. The district has formed a CBOC for Measure GG and Measure I. The district has established bylaws for the CBOC to define the role of committee members, which is to ensure conformance with the ballot language of Measures GG and I.
6. The oversight committee meeting is essential to the development of the Facilities Master Plan and direction, and to district and public trust. An effective CBOC is necessary to make sure the district is improving its facilities and spending bond monies to the public's satisfaction.
7. The CBO serves as the district's resource person for the CBOC. Both current and previous CBOs dedicated a significant amount of time increasing the committee's understanding of school facilities planning and construction. The district's facilities and operations staff and the consultants for facilities and construction have also provided support and information to the committee, but do not do so regularly.
8. FCMAT interviews found that CBOC members attend (virtual) meetings, meetings are regular, and they reach a quorum. Meeting agendas show the committee has conducted several meetings during this review period: March 24, 2021, May 19, 2021, August 30, 2021, November 16, 2021 and March 2, 2022.
9. Measure GG and Measure I Bond Programs: The 2019/2020 Audited Fiscal Year Annual Report and 2020/2021 Fiscal Year Expenditure and Progress Report stated the following:
  - All expenditures authorized by the school facility bonds have been presented by District staff and consultants to the CBOC.
  - Bond proceeds have been expended only for the purposes authorized by state law and set forth in the ballot measures.
  - Bond proceeds have not been expended for any other purposes, including teacher and administrative salaries and other school operating expenses.
  - Bond proceeds have been maximized.

## **Recommendations for Recovery**

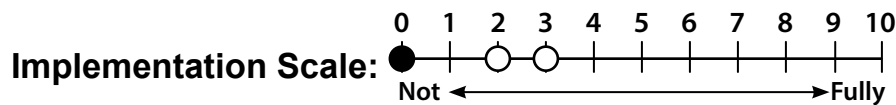
1. The district should reinstate the District Advisory Committee and ensure it meets regularly. The membership should be constituted according to district policy, and it should serve in an advisory capacity to the county administrator. The members need to understand their purpose and execute it well to assist the district in its success.
2. The district should ensure that the CBOC continues to meet regularly.
3. In addition to the CBO, the position responsible for facilities and operations and the district's architectural and construction management consultants should provide detailed costs and projects progress reports regularly to the District Advisory Committee and the Measures GG and I CBOC.



4. Project progress updates presented should include information spanning the entire term of the project to provide committee members, old and new, a complete picture.
5. At minimum, the district should annually inform the public in a regularly scheduled board meeting of the progress of the district's new 2022 Facilities Master Plan, the master plan's progress, the next projects, and the timing and schedule of the district's future projects that have been presented to the CBOC. A representative of the CBOC should be present to affirm.

## Standard Not Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	0
July 2022 Rating:	0





## 3.1 Facilities Improvement and Modernization

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### Legal Standard

The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)

### Findings

1. The district last revised BP 7110-Facilities Master Plan in February 2019.
2. The district still uses an aged Facilities Master Plan from 2015. A draft Facilities Master Plan was updated and reviewed on November 27, 2018, but a final was never adopted. The draft Facilities Master Plan was then presented in a PowerPoint presentation to the CBOC on February 28, 2019. The district has continued providing school improvements under the old plan and the draft Facilities Master Plan.
3. The Facilities Master Plan is out of date as much has changed over the years. Since the last review, major infrastructure needs exist and are beginning to fail. An example is a major sewer repair that needed immediate attention at Bennett-Kew Elementary. Roof repairs remain a major issue that is leading to a significant structural problem on exit pathways. Failure to maintain and make timely repairs to facilities can lead to a much larger safety problem and repair project. A needs assessment will need to be completed and considered in the development of the plan.
4. The district has contracted with an architect to develop a 2022 Facilities Master Plan, and development has begun. The draft submitted to FCMAT had insufficient information to evaluate at this stage and did not include any new projected needs. Completion is expected in late 2022.
5. The following work that was provided on an IUSD Maintenance, Operations and Transportation Plan Projects lists 2021-2022 Completed and Current Projects Lists and the Facilities and Maintenance Project Updates:
  - Woodworth-Monroe-consolidation and site improvements have been completed, such as new buildings, new playgrounds, joint property fence line, restroom privacy screens and meal services kiosk.
  - Morningside High School-classroom renovations, exterior improvements, sound attenuation improvements, technology upgrades, plumbing system replacement, landscaping/hardscape rehabilitation, security camera system upgrades, portable building renovations, pool window security mesh, future marquee refurbishment.
  - Oak Street Elementary-new courtyard, building renovations and portable building repairs, sound attenuation improvements, classroom upgrades, technology upgrades and campus fencing.



- Bennett-Kew Elementary-new portables are nearing completion, main entrance modifications, field upgrades, gas line infusion project and basketball court replacement.
  - Kelso Elementary-exterior building painting, portable building repairs, wood siding, stairs, facias and gutters
  - Warren Lane Elementary-exterior building painting, campus fencing, painting and gutter repairs.
6. As of 2021, the district had hired an experienced deputy chief maintenance and operations officer, and he had invested time to evaluate the department. Under his leadership, the district had begun prioritizing and correcting some of the most important improvements.
  7. Interviews indicated the planned district office and continuation school relocations have stalled, but no details were provided on the date and costs of these relocation projects.
  8. The district's first interim 2021-22 contains a budget of \$5,061,568.51 for routine restricted maintenance, which met its 3% required minimum contribution. The district's deferred maintenance fund was not budgeted for fiscal year 2020-21; however, as of January 26, 2022, the district's fund 14 deferred maintenance fund had a balance of \$356,779.50 with no expenses recorded for the fiscal year.
  9. The \$90 million Measure GG general obligation bond was intended to provide funding for new construction, repairs, and modernization of school facilities. The district as of September 2020 was expecting to use the approximately \$18 million remaining general obligation bonds from Measure GG in conjunction with LAWA funds to fund projects.
  10. In November 2020, the district passed Measure I, a \$240 million general obligation bond. The language for this measure states it is for Inglewood Unified School District Student Safety/Health/Achievement, Classroom Repair Measure to repair/upgrade classrooms, including instructional technology, vocational/career education, roofs, plumbing, security/fire safety; remove asbestos, lead paint, mold; provide safe drinking water; and acquire, construct, repair sites, facilities, equipment.
  11. The new 2022 Facilities Master Plan being developed is expected to include school consolidations/closures and a new list of projects using the balance of Measure GG and Measure I bond funds. The Facilities Master Plan should also include school facilities improvements to do the following:
    - Keep schools safe and prepared for emergencies.
    - Remove asbestos, lead paint, and mold.
    - Provide classroom technology for modern learning.
    - Upgrade computer, engineering, and science labs.
    - Improve college and career preparation.



- Repair leaky roofs, deteriorated plumbing, gas lines, electrical, and HVAC.
  - Retrofit classrooms and equipment for social distancing and deep cleaning.
12. State bond funding is exhausted. However, the state is considering a bond election for school facilities in fall 2022, and as of this spring, it appears the state will have support for its passage. The new bond is expected to include new CTE funding.
  13. The district did not provide a current modernization eligibility calculation and does not have plans for modernization or CTE facilities submitted to OPSC for approval and potential state funding.

## **Recommendations for Recovery**

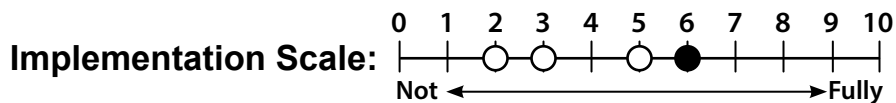
1. The district should regularly review and update BP 7110 as needed.
2. The district should continue to develop, review, evaluate and update its 2022 Facilities Master Plan. When the 2022 Facilities Master Plan is complete, the county administrator should adopt it.
3. As an essential part of the updated Facilities Master Plan, the district should include a facilities assessment. The assessment should include the latest data available regarding the district's facility needs, facility conditions and all funding resources. The new plan should be developed in consideration of acquiring and maximizing state, LAWA, and other complementary funding.
4. The 2022 Facilities Master Plan should include alternative viable proposals for the modernization, demolition, and school consolidation/closure.
5. When updating the 2022 Facilities Master Plan, the district's project changes and updates should be concisely identified, explained, documented, and summarized to allow the readers to understand the changes without reviewing the entire Facilities Master Plan.
6. The district should maintain the position of deputy chief maintenance and operations officer to ensure a knowledgeable person is leading the district's facilities planning.
7. The district should coordinate and fully use its available funding to include routine restricted maintenance, deferred maintenance, general obligation bond, LAWA and other funds to support its facilities needs.
8. The district should regularly provide information to the District Advisory Committee, Measures GG and I CBOC, and advisory board regarding the progress of projects, related cost and funding source, and include long-term future projected needs.



9. The district should finish developing the 2022 Facilities Master Plan to include school consolidations/closures. The plan should include a list of projects and a determination of how best to use the balance of Measure GG and Measure I bond funds. The district should continue to submit eligibility and future modernization projects to OPSC even though the state has exhausted prior bond funding. All projects should be designed, acquire DSA approval, and be submitted for OPSC funding approval as soon as possible so that they are in line for future allocations.
10. The district should consider whether to pursue CTE state funding for its high schools. If it chooses to do so, the district should determine the programs it wants to provide districtwide, and contact other districts that previously received high CTE ratings in those programs to determine recommendations that would benefit the application process.

### Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	3
July 2015 Rating:	5
July 2016 Rating:	6
July 2017 Rating:	5
July 2018 Rating:	5
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic.
July 2021 Rating:	5
July 2022 Rating:	6





### 3.3 Facilities Improvement and Modernization

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#### Legal Standard

All relocatable buildings in use meet statutory requirements. (EC 17292)

#### Findings

1. The district has an up-to-date inventory of owned/leased portables.
2. The district provided architectural records to FCMAT for most of its relocatable buildings.
3. The district has maps of each school site that displays the building layouts, but excluded recent portable building changes and did not provide the year built and DSA identification number for each portable.
4. Architectural services are helping the district acquire DSA approval on all relocatable buildings and provide completed status site plans. The district has improved significantly in getting relocatables approved and certified.
5. The district had a historical practice of purchasing, or leasing through a long-term lease, relocatable buildings for use as permanent facilities. As a result, it continues to have a significant number of portable classroom units that are owned or leased for greater than five years. In either case, the portables count against the district's eligibility for state facility funding. The district is working to remove nonessential relocatable classrooms.
6. Due to declining enrollment and the district's ability to house most of its students in permanent facilities that are less than 25 years old, the district's eligibility for state modernization funding is hampered since facilities are eligible for modernization funding at 25 years of age and older.
7. The district has removed two relocatable classrooms at Payne Elementary that were significantly dilapidated. These two classrooms had been moved to the Payne Elementary site to solve short-term student housing needs.

#### Recommendations for Recovery

1. The district should continue to maintain an accurate and up-to-date inventory record of its relocatable buildings.
2. The district should continue to examine its architectural records to ensure that all buildings meet statutory requirements. If buildings do not meet the statutory requirements or district standards, the district should remove them.
3. The district should continue using architectural services to gain final DSA approval, close out and certify the status of all its relocatable buildings. The site plans provided by the architect should be complete with all buildings and each relocatable building identified

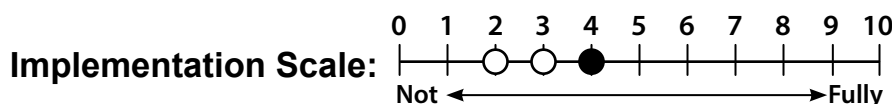


separately with DSA identification numbers and year built. Once developed, the district should be able to reference them and use the information to determine future projects needed. These documents should be in a format that can be given to future architects and other contractors working for the district. They should also be in a format that can easily be displayed and shown to an audience such as at district board meetings.

4. The district should continue evaluating the need for and use of all its relocatable/portable facilities and remove all unnecessary relocatable facilities.
5. The district should evaluate and scrutinize the relocation of any classrooms to ensure more favorable options are not available and make certain the cost of relocating is worthwhile. The district should never expend funds on relocating dilapidated classrooms. Instead, it should remove and replace them with a new leased unit using a lease agreement of less than five years whenever possible.
6. The district should limit its use of relocatable buildings to essential need on a basis of less than 60 months. This process should be tracked and not allowed to extend beyond five years.
7. If long-term facility needs are determined, the district should consider facilities on a concrete foundation. Manufactured classrooms on a concrete foundation can be built/installed faster and at a lower cost than permanent stucco/stud-built facilities. These facilities have a 50- to 75-year life span and lower maintenance costs compared to relocatable buildings.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 3.9 Facilities Improvement and Modernization

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### Professional Standard

The LEA manages and annually reviews its five-year deferred maintenance plan and verifies that expenditures made during the year are included in the plan.

Effective July 1, 2013, Assembly Bill 97 repealed State Allocation Board apportionment authority for the Deferred Maintenance Program and provided for the governing boards for each school district to have full local control over deferred maintenance expenditures, earnings and funds.

This standard is no longer applicable under current law and will be eliminated from the evaluation process and scoring rubric.

### Standard Not Applicable

July 2013 Rating: 0

July 2014 Rating: 0

July 2015 Rating: N/A

July 2016 Rating: N/A

July 2017 Rating: N/A

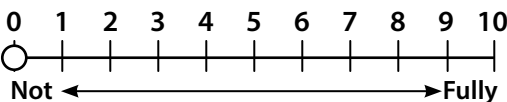
July 2018 Rating: N/A

July 2019 Rating: N/A

July 2020 Rating: Omitted per SB 98, Section 102 due to COVID-19 pandemic

July 2021 Rating: N/A

July 2022 Rating: N/A

**Implementation Scale:** 



## 3.10 Facilities Improvement and Modernization

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### Professional Standard

The LEA's staff are knowledgeable about procedures in the Office of Public School Construction (OPSC) and the Division of the State Architect (DSA).

### Findings

1. The district hired a deputy chief maintenance and operations officer who has experience working with state agencies such as OPSC, CDE, DSA, as well as local governmental agencies and is charged with overseeing facilities planning and construction functions. This officer provides the required professional leadership to guide the district's construction, engineering and architectural projects, legal claims avoidance practices and can work on multiple projects effectively and simultaneously at varying stages of completion.
2. Since his hiring, these areas have significantly improved, and the district has begun building organizational capacity.
3. Any person leading the district's facilities program should possess, at a minimum, knowledge of construction project management, delivery methods, construction legal claims avoidance practices, and management of all necessary consultants, including but not limited to funding, architectural, engineering, and construction delivery practices.
4. The deputy chief maintenance and operations officer duties include planning, coordinating, organizing, directing, supervising, and managing the district's comprehensive Facilities Master Plan as it relates to construction, modernization, remodeling, and reconstruction of facilities within the district.
5. This position is responsible for giving input on preparing the districtwide capital project budgets to provide the most cost-effective facilities plan to meet district construction needs within established timelines. This position is also responsible for coordinating the work of district staff, commercial realtors, financial consultants, and others in the successful completion of assigned projects. In addition, this position is responsible for directing, supervising, and formally evaluating the work of the staff under their direction.
6. The district's capital facilities projects cost accounting is performed and managed in its Fiscal Services Department.
7. The district lacks support staff members who are well versed in OPSC and DSA procedures and needs to provide training opportunities to increase knowledge in this area or hire staff with the appropriate expertise and experience.

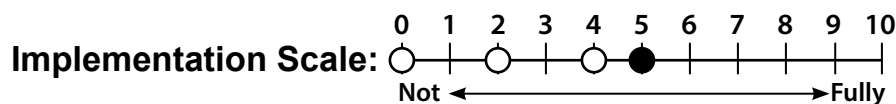


## Recommendations for Recovery

1. The district should maintain the management position over facilities, maintenance and operations to provide leadership, manage facility needs, work with state and local agencies, and oversee related staffs. This position should have knowledge and experience working with state and local agencies, of facility construction, and of school facility maintenance and operations.
2. The district should seek to have permanent, trained staff to provide support for the maintenance and operations leadership position.
3. The district should consider succession planning for all leadership positions to avoid a loss of district facility knowledge if staff retire or otherwise leave the district.
4. The district should continue to obtain and support training for all staff members who will be involved in oversight and have responsibility for all construction and modernization projects.
5. The district should continue to seek ongoing education and experience in selecting professional services needed for projects from organizations such as CASBO and CASH. In addition, the district should seek job-alike assistance from other school districts and learn from their experiences with the type of professional services sought.
6. The Fiscal Services Department should continue to perform and oversee cost accounting for future projects. In addition, the district should identify and train staff responsible for applying for state funding eligibility and for reporting expended funds as required by OPSC.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	0
July 2015 Rating:	2
July 2016 Rating:	4
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	5





## 4.1 Construction of Projects

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### Professional Standard

The LEA maintains a staffing structure that is adequate to ensure the effective management of its construction projects.

### Findings

1. The district's staffing that oversees and manages construction projects consists of the deputy chief maintenance and operations officer, CBO, senior executive director of fiscal services and custodial supervisor.
2. Stability in the district's facilities, maintenance and operations leadership position is essential for the district's success in managing its facilities and construction projects.
3. The deputy chief maintenance and operations officer position was vacant until 2021, when it was filled by the person who had held the interim position since December 2020. He has extensive experience, knowledge, and the ability to manage the duties of the position. As a result, significant improvement has been made in the appearance, safety and functionality of the district's facilities, and there has been progress in the district's construction projects.
4. The district lacks knowledgeable and experienced staff in the facilities, maintenance and operations department to support the deputy chief maintenance and operations officer position. Due to this lack of experience and knowledge, the district continues to employ an outside construction consultant.
5. During this review period, the district has made progress on the following major projects:
  - Completion of the merger of Woodworth Elementary and Monroe Middle School, which has led to the creation of the new Woodworth-Monroe TK-8 campus.
  - Construction upgrades to the Morningside High School classrooms and construction and sound mitigation improvements to Oak Street Elementary were nearing completion.
  - Shade structures and playground equipment have been added, replaced or repaired at several school sites.
  - Two dilapidated portables have been removed from Payne Elementary.
  - Blacktop surfaces on several sites were slurry sealed and uneven surfaces repaired including the repair of tree root bulges.
  - The Warren Lane Elementary lunch area shade structure cover that previously caused a safety issue was removed.



6. The district accounts for bond, LAWA, and state-funded projects separately, which allows for individual project identification, reporting and accountability.
7. The district provides for an independent audit of facility expenditures to include bond, LAWA, and state-funded expenditures as required.
8. The district continues to face substantial school improvement projects ahead. This requires evaluating, developing and implementing facility standards, facility maintenance and improvement projects and district facilities as well as right-sizing to appropriately fit the student population served, funding need and availability projections, securing the appropriate support services and managing projects. The development of the 2022 Facilities Master Plan and school consolidation/closure decisions should provide a roadmap for the district.
9. Maintenance and operations staff appeared to have limited input on the projects as they are being designed.

## **Recommendations for Recovery**

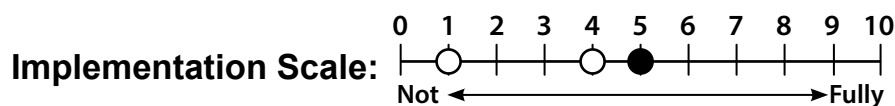
1. The district should establish a staffing and organizational structure with clearly defined roles and lines of authority to manage facilities and related projects. The structure should include positions responsible for decision-making, purchasing and bidding procedures, budgeting and accounting for project funds, maintaining project records, approving project change orders, agency reporting and communication at various levels.
2. The district should continue to maintain the deputy chief maintenance and operations officer position with a person who has extensive knowledge and experience in construction management as well as leadership and communication skills.
3. The district should consider hiring and/or developing other facilities support staff to continue the progress with the district's school facilities program. This should include succession considerations for leadership positions.
4. The district should continue using consultants as needed until the capacity of staff increases sufficiently to manage facilities. Some consultant use may be needed for special projects and to maximize funding applications that are not frequent enough to establish expertise in house.
5. The district should complete the development of a comprehensive facilities master plan and plans to match its facilities to student enrollment.
6. The district should continue to account for bond, LAWA, and state-funded projects separately to allow for individual project identification, reporting and accountability. These expenditures reports should be available for review as necessary and should be comprehensive, including information from the first to the final expense. Individual project reports should span multiple years and be available for review as necessary.



7. The district should continue providing for an independent audit of facility expenditures to include bond, LAWA, and state-funded expenditures as required.
8. Along with the deputy chief maintenance and operations officer, assign maintenance and operations staff to the design team during the project development process. Each step of the design's progress should be reviewed. Reviews and communications with maintenance staff should be conducted at least at 45%, 75% and 90% of plan development and prior to bidding of the project. Final plan approval should not be granted until maintenance and operations leadership and school administrators have reviewed and given input on the project.

## Standard Partially Implemented

July 2013 Rating:	1
July 2014 Rating:	1
July 2015 Rating:	1
July 2016 Rating:	5
July 2017 Rating:	4
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	5





## 4.2 Construction of Projects

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### Professional Standard

The LEA maintains appropriate project records and drawings.

### Findings

1. The district does not have documented processes and procedures to ensure file retention of construction records. The best practice would include developing and maintaining a defined policy handbook for records retention that includes roles and responsibilities of maintenance staff and a process to routinely evaluate the records retention procedure and its implementation.
2. The district has established an organized records retention facility.
3. The records retention facility holds records related to all past construction projects, including bid documents, state school facility records, and architectural drawings. With new construction projects taking place, the district should continue to pack, label, and permanently retain older records. However, the records retention area is not sufficiently protected from potential fire or water damage.
4. Prior records have been organized by school site and were easy to locate. The district has also implemented a checkout system for users who requested to view or check out the documents. The deputy chief maintenance and operations officer confirmed that this practice continues. Staff also indicated these practices are intended to continue with the new construction documents, and that most recent records and drawings are also delivered and archived in electronic format.
5. District staff stated that many records were now accessible to maintenance staff via electronic file. However, work order repairs and changes to existing building systems and drawings were difficult to get documented and updated. District staff and vendors have a great deal of knowledge of the district's sites and facilities. If staff leave the district, that institutional knowledge would be lost unless the project records and drawing files are comprehensive.

### Recommendations for Recovery

1. The district should create and implement a required processes and procedures handbook for the district's file retention library.
2. The district should continue to maintain the facilities and construction records in an organized manner. Plans and specifications, contract documents, and materials specifications should be maintained indefinitely.

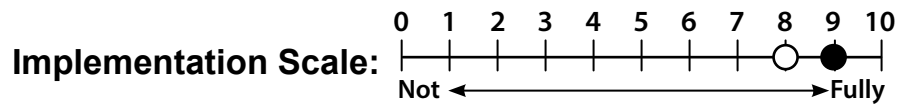


3. The district should ensure the records are secure and reasonably protected from destruction. Back up and/or electronic files should be kept ensuring the records are not lost.
4. The district should create a directory for the facility records repository indicating the exact records available and their location. The directory, preferably electronic, should be very detailed and cross-referenced so it can be searched and accessed easily by district staff.
5. The district should consult with maintenance and operations leadership as well as legal counsel to determine which documents are required for permanent records retention. The district should never purge documents without proper evaluation.
6. A system should be developed to ensure all project architects and contractors provide all necessary documents for each project, preferably in an electronic format. If not already defined, this requirement should be included in the construction contract's general conditions in future construction contracts. During construction, monthly contractor's payments should be held for lack of current marked up as-builts drawings ("as-built drawings" refers to architect plans that have notes and edits to indicate construction details if different from the original plans). If a construction management firm is used as a delivery method, this consultant should be held accountable for documenting as-builts for completeness. Final payments should be held from each architect and contractor until this information is confirmed and given to the district.
7. The district should annually evaluate the document retention processes including electronic storage software. Continued updating of software and saved files may be required so the district's facility and project records are secure, accessible, and readable.
8. The district staff should take project pictures of all work that is to be concealed, including underground utilities and piping, before walls are enclosed, etc. These images should be added to the electronic library filing system for future access by work crews and contractors during any maintenance, modernization, and new construction projects.
9. The district should create a policy to allow original paper documents to be removed only when necessary and only when no other option exists. No outside people should be allowed to handle documents unless they are bonded, district-approved vendors capable of handling the documents and process.
10. Bonded contractors should always handle paper originals at the district site, and the district should never allow private firms to take documents. Contractors should only identify the documents they require to finish the projects they are contracted to complete. This policy should also consider allowing only the release of electronic copies.
11. The district should have a paper printer that can print electronic files to scale for use in the field. Staff should make notes and sketches on prints that then should be documented into the existing file.



## Standard Fully Implemented

July 2013 Rating:	8
July 2014 Rating:	8
July 2015 Rating:	9
July 2016 Rating:	9
July 2017 Rating:	9
July 2018 Rating:	9
July 2019 Rating:	9
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	9
July 2022 Rating:	9





## 6.1 Facilities Maintenance and Operations

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### Legal Standard

The LEA is in compliance with requirement of the Williams case settlement. The governing board provides clean and operable flush toilets for students' use; toilet facilities are adequate and maintained. All buildings and grounds are maintained. (EC 17576, 17592.70-17592.73, 35186; CCR Title 5, Section 631, Section 4683, Section 14030)

### Findings

1. LACOE conducted seven of its eight facilities inspections required under the Williams Act by November 2021 using the Facilities Inspection Tool (FIT). Due to construction, Morningside High School was not inspected. Five of the schools reviewed received overall ratings of good and two received exemplary ratings. The district performed preinspections on the sites to be inspected by LACOE, but did not conduct facilities inspections on school sites not visited by LACOE.
2. See Standard 1.8 for detail on restroom cleanliness.
3. The district's RRMA budgeted \$5,061,569 for the 2021-22 fiscal year, this includes allocations for staff, repairs, parts and contracted services. This amount exceeds the required contribution of \$4,132,379.
4. FCMAT's site visits found that some modernization work was completed at Morningside High School. New relocatable classrooms were installed at Bennett-Kew Elementary along with an upgraded entry for security purposes. However, a significant deterioration of capital facilities continues to exist at many school sites and other district facilities.
5. The district's overall facilities capacity is more than twice the amount needed to house its total student enrollment. Most of this excess capacity is old and in disrepair. As a result, the district has to maintain more than twice the facilities needed to serve its students.
6. The district's Facilities, Maintenance, Operations and Transportation Department staffing is inadequate for the overall size of the district and the building square footage that needs to be maintained.
7. Since the district cannot handle all work orders, those generated because of unsafe or unsanitary conditions receive priority in the SchoolDude work order system.
8. The district has the equipment and supplies needed and available to effectively maintain and clean the sites.



9. The concrete walkways at the secondary and middle school sites had been heavily stained with chewing gum. During site visits, FCMAT observed improvements in the condition of concrete, specifically at Inglewood High School, Morningside High School, and City Honors International Preparatory School. Administrators indicated that the removal continues to be a high priority, and systematic efforts for removal of chewing gum stains remain in place.
10. Although they are not followed at every site, the district has procedures to conduct inspections of all restroom facilities several times per day to ensure they are clean, stocked, in proper working order and accessible during school hours.

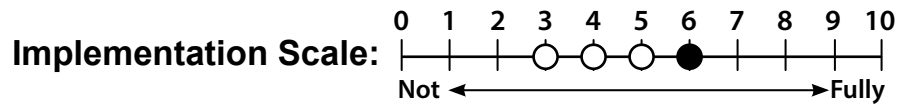
## **Recommendations for Recovery**

1. The district should conduct facilities inspections as required by the Williams Settlement.
2. The district should reinstate facilities inspections at all school sites not covered by the LACOE inspections, and use the FIT form to perform the inspections.
3. The district should adequately fund its Facilities, Maintenance, Operations and Transportation Department budget to meet statutory funding requirements and to ensure adequate maintenance of its school sites as required under the Williams legislation.
4. The district should continue to monitor the inventory of maintenance and cleaning equipment, including pressure washers, to ensure that equipment is available as needed.
5. The district should continue utilizing pressure washers with enough power to properly clean, including the removal of chewing gum residue off concrete walkways, and increase accountability to ensure cleaning occurs as needed.
6. When students and staff are on sites, the district should continue to require frequent daily inspections of all restroom facilities to ensure they are accessible, clean, stocked, and in proper working order.



## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	5
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	6





## 6.2 Facilities Maintenance and Operations

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### Legal Standard

The LEA has established the required account for ongoing and major maintenance. (EC 17014, 17070.75)

### Findings

1. The district's 2021-22 first interim total RRMA budget was \$5,061,569, which exceeds the amount required under EC 17070.75.
2. At the time of FCMAT's fieldwork, the CBO indicated that at the end of the 2020-21 fiscal year, the RRMA was not fully expended. Additionally, the CBO reported that based on spending patterns, the ending balance for RRMA will again have a remaining balance for the 2021-22 fiscal year.
3. The district has filled the deputy chief maintenance and operations officer position with a permanent staff member who has a high level of expertise in school facility maintenance. The deputy chief maintenance and operations officer has implemented many repairs around the district. This position is exercising authority over the maintenance and operations budget and allocating funds to complete projects.
4. As of January 2022, approximately 42% of the fiscal year remained and approximately 58% of the RRMA budget remained. Of concern is the district's management of the RRMA budget. Every site visited by FCMAT had facility maintenance issues. The district should consider fully using its RRMA funds considering the district's significant facility needs.
5. The district provided FCMAT with a multiyear plan for preventive and deferred maintenance in the past; however, no documents to support this area were provided for this review period. While the state no longer requires a deferred maintenance plan (see Standard 3.9), best practices dictate that the district develop and maintain a current plan for maintenance needs and budget adequate funds for those needs to prevent more expensive repair work in the future. The deputy chief maintenance and operations officer has the skills to develop and budget this plan.
6. In previous years, the Facilities, Maintenance, Operations and Transportation Department staff stated they had the opportunity to review planned capital facility projects and had recommended various types of infrastructure related repairs or maintenance to take place at the same time as the capital projects. However, there is no evidence that the maintenance staff provided input into facilities planning for capital projects during this review period. The maintenance staff provides a critical nexus between field conditions and the development of the scope of capital projects, and the loss of the staff's input risks optimization and effectiveness of the projects and funds.



7. The district does not fully use the PMDirect module of SchoolDude, which is intended to proactively schedule routine preventive maintenance work such as inspections and servicing of HVAC, roofing, fire alarms, etc. The district continues to address its maintenance issues as needed and lacks a budget for planned preventive maintenance projects that addresses the critical needs of major infrastructure related systems.

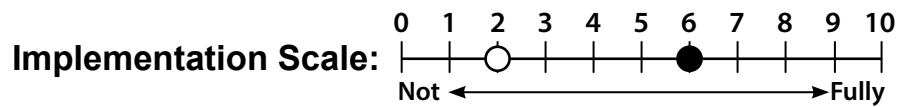
## **Recommendations for Recovery**

1. The district should continue its maintenance budget at an amount necessary to meet the requirements of EC 17070.75 and should fully use the funding available.
2. The district should update its five-year deferred maintenance and its preventive maintenance plans to include current facility conditions and needs even though the deferred maintenance program is no longer a legal requirement.
3. The district should address projects identified in the comprehensive, multiyear preventive and deferred maintenance plans. Additionally, accurate funding estimates should be used when projecting needed budget allocations.
4. To ensure accurate budgeting and ensure full use of funds, RRMA budgets and actual expenditures should be tracked and align with the timeline of the fiscal year. If unexpected expenses occur, budget transfers should be made.
5. Any position that is extended authority to oversee the routine restricted maintenance budget should be trained to read and understand the budget and its appropriate use. Those positions should have the authority and ability to allocate funds to appropriate projects and repairs. The budget should be regularly monitored to expend funds fully by the end of the fiscal year.
6. The district should implement a multiyear maintenance and equipment replacement plan to ensure transparency, accountability, and make certain that funds are spent on the proper needs of the district.
7. The district should create a maintenance project list that identifies the need to repair or replace large, deferred maintenance items, such as roofs, pavement, underground utilities, boilers, HVAC units, electrical systems, etc. based on life cycle costs.
8. The district should include maintenance staff in planning for capital projects to provide input on recommendations of infrastructure related repairs or maintenance to take place at the same time as the capital projects.
9. The Facilities, Maintenance, Operations and Transportation Department should expand the use of the PMDirect module of SchoolDude.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	6
July 2016 Rating:	6
July 2017 Rating:	6
July 2018 Rating:	6
July 2019 Rating:	6
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	6
July 2022 Rating:	6





## 6.3 Facilities Maintenance and Operations

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### Professional Standard

The LEA uses and maintains a system to track utility costs and consumption and to report on the success of its energy program in reducing the cost of utilities. An energy analysis has been completed for each site.

### Findings

1. BP and AR 3511 were approved on February 20, 2019. This policy and regulation promote the effective use of the district's fiscal resources through a resource management program. Minimizing utility costs is one of the strategies listed in the policy to implement effective and sustainable resource practices. To accomplish this, tracking utility costs and energy consumption is necessary.
2. There is no system to track utility costs or energy consumption. Staff interviews indicated no reviews of energy consumption are performed. The district provided FCMAT with a spreadsheet tracking various utilities such as AT&T, Southern California Edison, Golden State Water and the City of Inglewood. This spreadsheet was not comprehensive, and interviews confirmed this information is not used to illustrate smart energy practices, which can improve equipment efficiency and lengthen equipment life.
3. The district does not use an EMS although it had implemented a limited computerized system in the past.
4. During past interviews, the district indicated a comprehensive energy analysis was completed. The district entered into an agreement with Alliance Building Solutions, Inc. on October 12, 2016, to provide the work and services to install interior and exterior LED lighting, energy-efficient HVAC upgrades, and building automation and controls. No subsequent analysis has been completed.
5. The district has included energy efficient upgrades in its recent facility improvement and site consolidation projects. In addition, Measures GG and I include the goal and purpose to "upgrade of facilities for energy efficiencies."
6. During interviews in 2016, the district indicated the intent to hire a part-time person to monitor utility costs and help change behavior regarding utility usage. The Environmental Protection Agency Energy Star program demonstrates that behavioral changes, training, and energy-use tracking allow an organization to create a self-sustaining energy conservation program. Interviews in 2017, 2018, 2019, 2021 and 2022 confirm this position had not been filled.

### Recommendations for Recovery

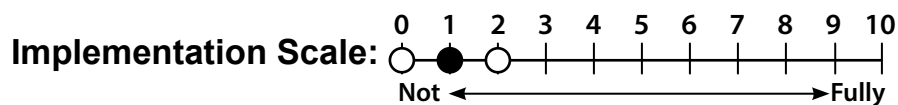
1. The district should review and update BP and AR 3511 as needed to ensure they are current.



2. The district should identify a district-level person dedicated to monitoring energy usage and cost, focusing on staff behavioral changes regarding energy usage and identifying programs to help increase energy efficiency.
3. The district should develop and implement a process to track utility costs and energy consumption and comply with BP and AR 3511. This process should incorporate using the district's utility providers' online monitoring tools. These tools can include energy usage charts, demand response programs, and smart meters.
4. The district should consider conducting a comprehensive energy analysis every five years to identify opportunities for energy and cost savings.
5. The district should assess the capability of its EMS and consider its repair or replacement to ensure it can support implemented energy conservation measures such as interior occupancy sensors, lighting retrofits and the latest air conditioning systems.
6. The district should continue implementing energy conservation measures including interior occupancy sensors, lighting retrofits, and new HVAC equipment as opportunities arise.
7. The district should ensure energy efficiency considerations are included in its bond-supported projects as identified in Measures GG and I.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	1
July 2022 Rating:	1





## 6.4 Facilities Maintenance and Operations

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### Professional Standard

To safeguard items from loss, the LEA keeps adequate maintenance records and reports, including a complete inventory of supplies, materials, tools and equipment. All employees who are required to perform custodial, maintenance or grounds work on LEA sites are provided with adequate supplies, equipment and training to perform maintenance tasks in a timely and professional manner.

### Findings

1. The district continues to keep adequate maintenance records and has inventoried all the tools, materials, supplies and equipment that are stored at the maintenance and operations/central warehouse facility. The district continues to organize and improve the maintenance and operations/central warehouse facility with removal or discarding of unused or antiquated equipment.
2. During the visit to the central warehouse, FCMAT observed groundskeeping tools randomly stored throughout the facility.
3. Employees who perform custodial, maintenance, or groundskeeping work are generally provided with adequate supplies and equipment to perform their tasks in a timely manner.
4. School sites order custodial supplies from a central warehouse via the PeopleSoft financial management system. There is no consistency in oversight and approval of site orders by site administration. The senior storekeeper orders all supplies for the warehouse. The custodial supervisor oversees the fulfillment of the maintenance and custodial supply requisitions from the school sites.
5. The district maintains a computerized inventory of the supplies kept at the central warehouse through the PeopleSoft inventory control module; however, FCMAT was not provided with documentation of periodic or annual physical inventory counts. Through a review of the PeopleSoft inventory and a visit to the central warehouse, stock for custodial cleaning and paper products appeared sufficient to ensure orders from school sites can be completely and regularly filled. FCMAT observed a stockpile of supplies at the warehouse purchased in response to COVID-19 needs.
6. During site visits, custodians reported that most orders were fulfilled in a reasonable time and with completeness; however, some supply chain issues have caused delays or affected the quantity of material received at the sites.
7. FCMAT observed that most schools maintain a small number of custodial supplies at the sites, but they did not maintain a written or computerized site supply inventory.



8. The district hired a new custodial supervisor in January 2021. The custodial supervisor, who was promoted from within the district, did not know about the custodial handbook. Since then, the custodial supervisor has received training with FRISK (employee accountability process) and supervisory expectations have been identified.
9. During site visits, FCMAT observed that many sites have identified areas for the storage of custodial supplies. Many custodial closets have storage racks, and most were orderly and neat. This allows the custodial supervisor to quickly assess the contents and supplies.
10. The district returned to in-person instruction during this review period. Site custodians reported that restrooms are monitored and checked for unsanitary conditions, although observations of restrooms during site visits indicate these facilities are not cleaned consistently. Site custodians also reported that the custodial supervisor has created a checklist for the process of monitoring and checking restrooms; however, this document was not provided to FCMAT.
11. Staff reported that when cleaning deficiencies are found at school sites, 30-day action plans are developed to assist site custodians improve cleaning, sanitization, and disinfection. FCMAT requested an example of these documents; however, they were not provided.
12. All sites appear to have auto-scrubbers and backpack vacuums. All elementary sites have carpet cleaners. Additionally, some sites have been provided with walk-behind floor scrubbers and pressure washers. During the 2019 site visits, FCMAT was informed that many new pieces of equipment (such as the “I-mop”) had been purchased and provided to site custodians, although FCMAT only found one at a site that did not appear to be used regularly. No “I-mops” were found during this year’s visit.
13. The district has provided on the job and online training to maintenance and operations staffs in the safe and effective use of materials and equipment.

## **Recommendations for Recovery**

1. The district should continue to maintain and keep current a computerized inventory system for all maintenance, operations and transportation supplies, tools, and equipment. These items should be organized and secured in a predetermined location at the warehouse. In addition, a schedule for replacement should be developed.
2. The district should continue to provide staff with adequate supplies and equipment to perform their tasks.
3. The PeopleSoft inventory module should be expanded, if possible, to school sites and networked with the central warehouse to support the direct ordering of supplies, communication of order status, and historical supply usage.

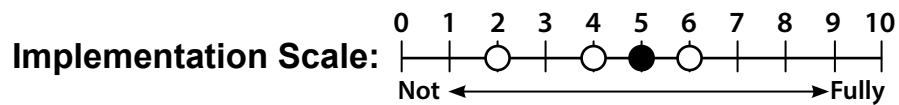


4. The PeopleSoft inventory module should be checked monthly, and a complete physical inventory count and reconciliation should be completed at least once per year to ensure count and value accuracy.
5. The district should continue to maintain a minimum inventory of custodial and maintenance supplies and equipment to support timely access to essential items based on the ordering information contained in the PeopleSoft inventory module.
6. With the assistance of the custodial supervisor, sites should develop their own inventory for custodial supplies. The site administrator and the custodial supervisor should regularly review the inventory and should always have access to custodial closets as well as the ability to perform random audits of inventory. The district should develop standards for the amount of material a site maintains in stock based on the number of restrooms and the student population. The approval for ordering site custodial supplies should come from the school site administrator and be reviewed by the custodial supervisor. An inventory list should be maintained in each custodial closet.
7. The district should continue to provide all custodial, maintenance and groundskeeping employees with safety and effective use of materials and equipment training. Records of all trainings should be maintained and include name of instructor, topic, dates, and attendees. Additionally, if staff are provided equipment and trained to use it, the district should ensure staff implement it as intended.
8. The district should monitor the industry best practices for maintenance, groundskeeping and custodial trades and provide equipment and training based on those professional practices to ensure that the district uses techniques that are the most effective and efficient.
9. The district should consistently implement action plans to help custodians improve cleaning, sanitization, and disinfection procedures. These documents can be used in annual evaluations.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	2
July 2016 Rating:	2
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	5
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	5
July 2022 Rating:	5





## 6.5 Facilities Maintenance and Operations

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### Professional Standard

Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.

### Findings

1. The district has procedures for evaluating the quality of work performed by the maintenance and operations staff.
2. The district has developed an organizational chart for the Facilities, Maintenance, Operations, and Transportation Department that outlines supervisory and evaluation responsibilities. The reporting structure includes a custodial supervisor, who directly oversees day and night site custodians. However, during FCMAT visits in 2021 and 2022, staff reported that the site administrators supervise the custodians with support and evaluation input provided by the custodial supervisor.
3. The district's organizational charts and job descriptions have discrepancies in position names. For example, one organizational chart lists a custodial supervisor while another organizational chart and the job description calls the position custodian supervisor.
4. The deputy chief maintenance and operations officer position directly oversees approximately 26 FTE staff, including an administrative assistant, transportation coordinator, custodial supervisor, maintenance supervisor, document control specialist and maintenance and groundskeeping employees. Although span of control refers to the number of subordinates reporting directly to a supervisor, it may also refer to the number of departments a supervisor can reasonably manage. The deputy chief maintenance and operations officer position has a maintenance supervisor to assist with maintenance oversight responsibilities, but according to the organizational chart and interviews, the skilled maintenance specialists report directly to the deputy chief maintenance and operations officer and do not report to the maintenance supervisor.
5. During FCMAT's visit, evaluations for all maintenance, custodial, groundskeeping and transportation staff members had not been completed for 2020-21 or 2021-22. FCMAT was informed that the district waived evaluations for the 2020-21 year because of the changing demands and availability resulting from the COVID-19 pandemic.
6. The custodial supervisor has received official training in the use of FRISK and helps site administrators conduct and document employee performance and discipline.

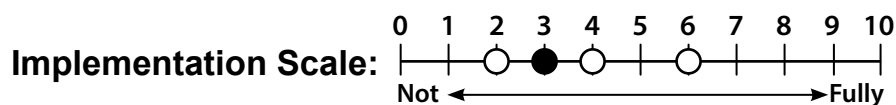


## Recommendations for Recovery

1. The district should follow its adopted procedures for the evaluation of district maintenance and operations staff. Evaluations should be completed according to district timelines. The HR Department should monitor evaluations and ensure they are completed as prescribed and align with collective bargaining agreements. The HR Department should verify that the appropriate signatures are on each evaluation.
2. The district should review and maintain its organizational chart for the Facilities, Maintenance, Operations, and Transportation Department and update it as changes are made. This information should be distributed to all sites and affected personnel in the district.
3. The district should ensure that site administrators include the custodial supervisor during custodian evaluations. The custodial supervisor should address technical skills, while the principals address soft skills, such as communication, interaction with staff and responsiveness.
4. The district should determine the proper span of control for the deputy chief maintenance and operations officer to ensure responsibilities are evenly balanced and adequate supervision is provided.
5. The district should provide all supervisors formal training in employee performance evaluations. This will ensure those evaluations meet all legal and collective bargaining requirements.

## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	4
July 2018 Rating:	6
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 6.6 Facilities Maintenance and Operations

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### Professional Standard

The LEA has identified major areas of custodial and maintenance responsibility and specific jobs to be performed. Written job descriptions for custodial and maintenance positions delineate the major areas of responsibility for each position.

### Findings

1. In 2020-21, the district updated the organizational chart for the Facilities, Maintenance, Operations, and Transportation Department to include the deputy chief maintenance and operations officer. The district previously added a custodial supervisor to oversee all site custodians in conjunction with the site principals. As of January 2021, a site custodian was promoted to the custodial supervisor position. This shows a commitment to adequate custodial supervision.
2. FCMAT was provided with updated job descriptions with revision dates indicating board approval for only custodian positions. The Americans with Disabilities Act permits employers to define a job and the functions required to perform it, including qualifications and work quality and quantity standards. Although the Americans with Disabilities Act does not require written job descriptions, having these before advertising or interviewing applicants is strong evidence of whether a particular job function, such as driving, is considered an essential function. Therefore, keeping job descriptions current and listing all essential job functions is vital in managing the risks of Americans with Disabilities Act claims.
3. The district developed a custodial handbook in January 2017 that identifies cleaning methods and performance standards for custodial positions. The handbook is available in its original form on the district website under the Facilities, Maintenance, Operations and Transportation Department section. In previous years, staff reported that all custodial staff had received this handbook and had been trained in its content. During site visits, FCMAT observed a mixed response from both principals and custodians about the availability of the custodial handbook, indicating new site administrators and custodians had not been informed of the existence or trained on the content of the handbook.
4. The district modified work schedules for maintenance staff, groundskeepers, and custodians during the COVID-19 pandemic. FCMAT was provided only a general schedule with start and stop times for these positions. Specific schedules for custodians were not provided.
5. During the 2017-18 site visits, staff reported that the custodial supervisor had started monitoring custodial performance using an activity tracker process, and each custodian's activities were logged for an entire shift and opportunities for efficiency were noted. During site visits in 2019, 2021, and again in 2022, there was no reported use of this process.



6. The district does not have a handbook for maintenance and groundskeeping personnel that identifies maintenance strategies, performance standards and organizational structure.

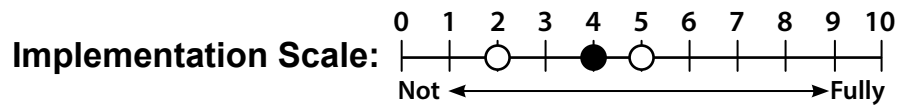
## **Recommendations for Recovery**

1. The district should routinely review and maintain its organizational chart for the Facilities, Maintenance, Operations, and Transportation Department and update it as changes are made. This should be communicated to site staff to ensure that problems, concerns, recommendations, or commendations are communicated through the proper chain of command.
2. All maintenance and custodial job descriptions should be reviewed, updated, board-approved and published in a standardized format. Job descriptions should reflect the roles, tasks, and supervisory responsibilities under the current organizational structure.
3. The district should continue using the cleaning methods and performance standards identified in the custodial handbook as part of employee evaluation criteria. The custodial handbook should be regularly updated at least every year with up-to-date best practices and employees trained accordingly.
4. The district should frequently review and modify work schedules as needed and to align with COVID-19 needs. Specific schedules by position and site should be developed to ensure coverage and accountability.
5. The district should reinstate the custodial activity tracker process to monitor site custodial staff and ensure custodial activities are efficient. Schedules should be detailed, outlining normal tasks, describing each facet of the task and assigning an allotted time to each task. Additionally, substitute custodians will be able to follow these types of schedules with limited instruction. A detailed work schedule also ensures equal distribution of the workload.
6. The district should develop a maintenance and groundskeeping handbook. This will ensure staff is aware of performance standards and provide a basis for performance evaluations.



## Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 6.7 Facilities Maintenance and Operations

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### Professional Standard

The LEA has an effective written preventive maintenance plan that is scheduled and followed by the maintenance staff and that includes verification of work completed.

### Findings

1. The district does not have a written preventive or routine maintenance plan. An effective preventive maintenance plan includes major system components such as painting, electrical and technology upgrades, HVAC servicing, roofing, flooring, asphalt resurfacing, electrical upgrading, and plumbing repair.
2. The district does not maintain a schedule for repairing or replacing equipment. Therefore, facility modernization projects may not consider the upgrades of critical infrastructure components needed to meet current educational delivery demands.
3. The work order system allows for the reporting of issues that require the Facilities, Maintenance, Operations and Transportation Department's attention. The maintenance supervisor assigns daily work orders to the maintenance staff based on immediate site needs.
4. At the time of document review, the work order system indicated that approximately 44 work orders were open/pending. Documentation provided to FCMAT indicated that many work orders were completed in a timely manner. Site administrator interviews indicated that the maintenance staff is responsive to work orders, but follow up phone calls or emails are sometimes required to help expedite some repairs. This is a significant reduction in open/pending work orders as compared to previous review periods (e.g., 450 identified in 2018-19 and 158 identified in 2020-21).
5. Due to declining enrollment, the district maintains more facilities than are needed; this results in the department not being adequately staffed to maintain the existing facilities.
6. In 2016, the district implemented SchoolDude, which became the active computerized work order system. Principals report they have access to the system and are comfortable navigating through the program, but indicate school site office managers track most work orders. Principals report that they routinely upload pictures to the work order requests.
7. The district has subscribed to the preventive maintenance module, PMDirect, in the SchoolDude program, but there is no preventive maintenance plan. A review of provided documents for preventive maintenance work orders suggests the district continues to be reactive rather than proactive in preventive maintenance. This is likely to continue until the district matches its facilities to student enrollment and/or otherwise catches up with facilities maintenance work.



8. The district does not use the preventive maintenance module to generate work orders for recurring maintenance tasks before they become areas of need or even emergencies.
9. The deputy chief maintenance and operations officer has identified and addressed some longstanding needs at the sites and throughout the district to be more proactive and efficient.

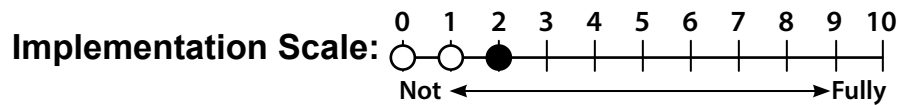
## **Recommendations for Recovery**

1. The district should develop a written, comprehensive, and proactive preventive maintenance plan that includes identified annual preventive maintenance projects, service intervals, long-term repair and replacement schedules, and costs to be included in the FSP. The preventive maintenance plan should be reviewed and updated no less than annually. The district should provide annual budget allocations to support the plan.
2. The district should establish a system of evaluating repair or replacement of equipment based on age, repair frequency, cost to repair, and replacement cost. The district should regularly budget for the repair and replacement of necessary maintenance equipment.
3. The district should use of the PMDirect preventive maintenance module to generate work orders for recurring maintenance tasks. The district should include a list of regularly scheduled preventive maintenance tasks in the system to include items such as testing emergency lighting, roof examinations, cleaning roof gutters, clearing storm drain inlets, and cleaning and repair of equipment. Work orders should be regularly reviewed and analyzed to identify recurring needs, and these needs should be incorporated into maintenance project planning.
4. The district should consult with maintenance, groundskeeping, and site custodial staff when developing a preventive maintenance plan and facility modernization projects. Employees in these departments have historical knowledge and/or site-specific awareness of critical components that need replacement and maintenance.
5. Facilities, Maintenance, Operations and Transportation Department work order review procedures should be established and communicated to maintenance staff and site administrators. After work orders are completed, they should be electronically signed by the employee performing the work and the site principal, as well as reviewed by the department head for timeliness, efficiency, and cost. The district should review its organizational structure and budget to determine if additional staff can be added to assist in completing maintenance work orders.
6. The district should continue the use of the SchoolDude work order system and continue to provide training to all district maintenance and applicable site personnel in its use.
7. The district should be diligent in its efforts to match facilities to student enrollment to reduce work on nonessential facilities and sites.



## Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	1
July 2016 Rating:	1
July 2017 Rating:	1
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 6.8 Facilities Maintenance and Operations

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### Professional Standard

The LEA has planned and implemented a maintenance program that includes an inventory of all facilities and equipment that will require maintenance and replacement. Data should include estimated life expectancies, replacement timelines, and the financial resources needed to maintain the facilities.

### Findings

1. Little change has occurred in satisfying this standard since the 2019 review.
2. FCMAT's site visits reflected a variety of facility and equipment needs.
3. As was discussed in Standard 6.1, site visits indicate a significant decline in facilities even though they have been used less in the past years due to the pandemic. The district has not implemented a preventive/proactive maintenance plan. The district Facilities, Maintenance, Operations and Transportation Department operates in a reactionary mode, resulting in the inability of the maintenance staff to keep up with the decay, affecting district operations.
4. The district has a master inventory of facilities, but it is not current. On February 17, 2021, the district awarded a contract to CBIZ Valuation Group to perform a capital asset inventory and valuation, barcode tagging, and reconciliation to the district's existing fixed asset list. Interviews and documentation support that a physical inventory, bar coding and asset tagging were performed. However, there is no evidence that an exception report was produced. A list of district relocatable buildings was provided for this review. The list contained the relocatable buildings that have been removed from Bennett-Kew Elementary School, indicating the master list is not up to date. See Standards 10.5 and 16.1 in the Finance Section for further details.
5. The district had developed a detailed inventory by site, including building square footage, site acreage, quantity of landscape turf, and quantity of asphalt. These documents were not provided for this review, so it is unknown if the district regularly updates this information.
6. The district does not maintain an equipment replacement schedule.
7. The district does not complete, at minimum, a biennial physical inventory and reconciliation.

### Recommendations for Recovery

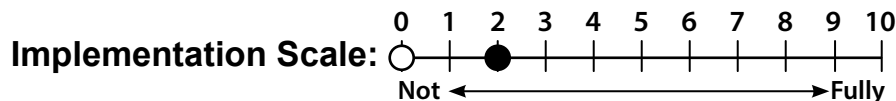
1. The district should use a current building inventory list to determine accurate maintenance and operations staffing levels using CASBO and Florida's Department of Education formulas.



2. The district should develop a replacement schedule for all its equipment, including a list of funding sources for equipment purchased with federal funds. The district should annually budget for the replacement of necessary equipment based on the replacement schedule it develops.
3. The district should inventory and track capital items that have a useful life of one year or more and cost \$500 or more per unit. If items are purchased with federal funds, the district is required to include additional information in its inventory records, including the funding source, titleholder, and percent of federal participation according to 2 CFR 20.313 and 5 CCR 3946. In addition, an extensive physical inventory should be completed every two years, ensuring the master inventory list is accurate. Asset tags should be placed on appropriate units at the time of delivery to the district warehouse and before distribution to the individual sites or departments.
4. The district should ensure that it annually updates its detailed inventory of buildings, including building square footage, site acreage, major equipment installation dates (e.g., HVAC units and electrical equipment), quantity of landscape turf, and quantity of pavement.

### Standard Partially Implemented

July 2013 Rating:	0
July 2014 Rating:	0
July 2015 Rating:	0
July 2016 Rating:	0
July 2017 Rating:	2
July 2018 Rating:	2
July 2019 Rating:	2
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	2
July 2022 Rating:	2





## 6.9 Facilities Maintenance and Operations

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### Professional Standard

The LEA has a documented process for prioritizing and assigning routine repair work orders. The LEA has a work order system that tracks all maintenance requests, the employee assigned, dates of completion, labor hours and the cost of materials.

### Findings

1. In October 2016, the Facilities, Maintenance, Operations and Transportation Department began using SchoolDude as the district's work order system. All open work orders in the previous software system, Track-It, were converted to SchoolDude. The district has fully embraced the use of SchoolDude; however, staff reported during the 2021 review, that the district was considering moving to another work order system. A specific reason was not provided, but this could lead to a loss of historical data.
2. During this year's review, interviews indicated the district decided to continue to use SchoolDude and is not considering a change to another system.
3. The district has provided training for the use of SchoolDude to principals, vice principals, office managers, and maintenance staff in the past; however, due to the turnover of staff, interviews indicated that additional training is needed.
4. The Facilities, Maintenance, Operations and Transportation Department administrative secretary electronically organizes work orders, and the maintenance supervisor assigns them daily to the maintenance staff. The deputy chief maintenance and operations officer monitors this process and will prioritize and reassign work based on emergency or technical expertise needed to complete a specific work order.
5. Previous reviews reported that the maintenance staff had been issued electronic tablets, which replaced the need to print work orders. However, the department administrative secretary reportedly continues to print work orders. Maintenance staff does not document information on work orders such as the amount of time spent on a project, the cost of materials or a description of the work completed.
6. The SchoolDude work order system can be updated in real time. Interviews with site principals indicated that updates with details about assigned work orders are not regularly completed. Principals also indicated they do not sign off on the work orders once completed, but can check the work order system to determine the status of a work order request. Because of the infrequent updates, this information is not reliable. Site administrators reported that the deputy chief maintenance and operations officer routinely makes site visits and there is effective communication on work order status.
7. Principals reported that most work orders are addressed in a timely manner; however, all maintenance activities are reactionary, with only a limited number of maintenance activities being preventive.



8. According to documents provided to FCMAT, vandalism and/or tagging is tracked in the work order system. This allows the district to accurately determine how much effort in time and materials is expended to address this work. Site and department staff interviews indicated these tasks regularly divert them from scheduled work. During site visits, FCMAT learned that the district prioritized responding to vandalism and tagging. Staff reported that the first task every day was to address any tagging that occurred the prior night. Tracking this information can help the deputy chief maintenance and operations officer determine staffing levels.

## **Recommendations for Recovery**

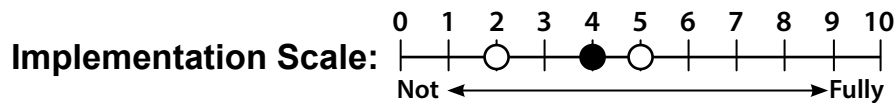
1. The district should continue to increase the amount of information recorded in the work order system. Work orders should be updated daily with information such as the status of the repair, parts or material used, and labor hours required to complete a work order. This should be done at least daily to ensure timely and accurate communication to site staff. This system would allow the Facilities, Maintenance, Operations and Transportation Department to better predict required budgets for the future and the personnel required to complete work orders in a timely manner. Additionally, it can reduce the need for site administrators to follow up on pending work orders. Updating the work order system in a timely manner will also help the district track productivity and costs and help prioritize and assign work.
2. The Facilities, Maintenance, Operations and Transportation Department maintenance supervisor should continue to assign work orders. This allows the maintenance supervisor to monitor the types of repairs and work required at school sites.
3. Training on the use of SchoolDude should be offered regularly and required of new staff members to ensure the system is used effectively.
4. The Facilities, Maintenance, Operations and Transportation Department should immediately communicate to school site administration when work orders are completed. This should be done electronically through the work order system and preferably also with face-to-face communication to allow site administration to verify the completion of work orders to their satisfaction.
5. The Facilities, Maintenance, Operations and Transportation Department should use work order information to help the district determine accurate maintenance and operations staffing levels. Formulas such as those developed by CASBO and Florida's Department of Education can help in these calculations.
6. The district should review its organizational structure and budget to determine if additional maintenance staff should be added to assist in completing maintenance work orders and to ensure work orders are completed in a timely manner.
7. The district should implement policies and procedures to determine work order priority and estimated completion dates as part of the feedback to school sites.



8. The district should consider tracking and creating a report for vandalism and tagging work orders by site, location on sites, types of vandalism and occurrence.
9. District administration and the deputy chief maintenance and operations officer need to review and evaluate departmental needs and requirements for the Facilities, Maintenance, Operations and Transportation Department to be successful at meeting all goals, needs and budget limitations.

### Standard Partially Implemented

July 2013 Rating:	2
July 2014 Rating:	2
July 2015 Rating:	4
July 2016 Rating:	4
July 2017 Rating:	5
July 2018 Rating:	5
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	4
July 2022 Rating:	4





## 7.2 Instructional Program Issues

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### Legal Standard

The LEA has developed and maintains a plan to ensure the equality and equity of all of its school site facilities. (EC 35293)

### Findings

1. BP 7110 was revised in February 2019. This policy states that one component of the Facilities Master Plan should be the “Analysis of the safety, adequacy, and equity of existing facilities and potential for expansion, including the adequacy of classrooms, school cafeterias and food preparation areas, physical activity areas, playgrounds, parking areas, and other school grounds.”
2. BP 7110 authorizes the development of a facilities master plan based on district needs and aligned with the district’s goals for the instructional program. In 2015, the district prepared and approved a Facilities Master Plan that addressed facility conditions in relationship to educational program development. The plan contained a comprehensive inventory of attributes for each of the district school sites, the available facilities and plans for their improvement. It also included a comparative assessment of the sites and their existing needs across a range of areas, such as flooring, electrical, computing capacity and other quantifiable metrics.
3. The district has created multiple project lists for various sites. However, because of a loss in enrollment and changing leadership, those priorities have changed frequently.
4. In November 2018, the district refocused the type and scope of projects throughout the district. Additionally, the district Facilities Master Plan, updated in November 2018 included changes in the district, but was not board-approved, and continued to exclude a condition assessment of campus infrastructure or major system components and strictly focused on renovation and new construction.
5. In early 2019, because of continued declining enrollment, the district drafted a plan for school closures, property surplus and facilities projects to balance the closure of some facilities, or reduction in used space, with the community’s needs. As of the time of FCMAT’s 2019 site visits, school consolidation had been addressed at two sites, and the district’s administrators were considering future consolidation.
6. On April 24, 2020, the district again refocused the type and scope of projects. The district provided FCMAT its Facilities Projects Implementation Plan and Budget for the 2019-20 fiscal year. The estimated budgets included funds from Measure GG, LAWA and other facility funds. This list contained many projects that were “on hold” or “TBD” (to be determined), as Measure I had not yet been approved, its funds had not been incorporated into the project plan and budget.



7. On October 6, 2021, the district hired an architectural firm to develop a new facilities master plan to assist the district in extensive short- and long-term facilities planning for its programs and school sites. As of the date of FCMAT’s visit, the master plan had not been completed.
8. The district used the services of CTPED Safe Schools to develop a campus security assessment report for each of its campuses.
9. In November 2012, the district passed Measure GG, which provides \$90 million in general obligation bonds.
10. In November 2020, the district passed Measure I, which provides \$240 million in general obligation bonds for future construction projects. As with Measure GG, the bond language identifies all district sites as eligible for improvements including school site health, safety, and security projects; renovation, repair, upgrade, and construction projects; wiring and technology for instructional support and learning projects; and other miscellaneous projects such as issues identified during construction, unforeseen conditions, rentals/leases, and other work necessary to complete these projects. The passage of Measure I continues to demonstrate the community’s support in upgrading facilities.
11. LACOE performs Williams Act inspections on eight of the district’s sites. The district performs preinspections on the sites scheduled for a LACOE visit and should conduct inspections on the remaining sites.
12. Throughout the years, the district has experienced staff turnover in key decision-making positions. This creates a problem with changing priorities and continuity of information, which is evident in the number of times the district has “refocused” project types and plans for districtwide facilities.

## **Recommendations for Recovery**

1. The district should regularly review and update board policies related to facilities to ensure they reflect the latest equality and equity considerations.
2. As required by BP 7110: “The master plan shall be regularly reviewed and updated as necessary to reflect changes in the educational program, existing facilities, finances, or demographic data.”
3. When updating its Facilities Master Plan, the district should include the required components as follows:

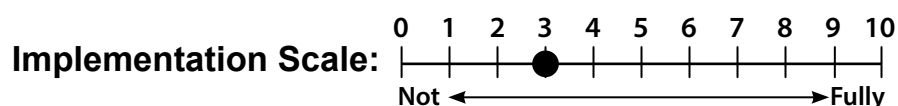
...analysis of the safety, adequacy, and equity of existing facilities and potential for expansion, including the adequacy of classrooms, school cafeterias and food preparation areas, physical activity areas, playgrounds, parking areas, and other school grounds. [BP 7110]



4. Because of continued declining enrollment, the district should implement a balanced action of school consolidation, which allows the funds from Measure GG and Measure I to be used equitably and efficiently. The district commissioned an updated facility master plan on October 6, 2021. The term of the agreement with the architectural firm is one year. The district should ensure the updated master plan is completed within that timeline. This updated facility master plan should include any proposals for school consolidation and elimination of unused buildings as well as for infrastructure or major system components. Once this plan is updated and approved, the district should implement it consistently.
5. The recommendations developed in the campus security assessment reports should be implemented at each school campus as funding allows.
6. In expending the funds from Measure GG and Measure I outlined in the scope of projects identified in the bond language, the district should organize and prioritize the projects to maximize attendance areas and physical capacity of each site, and account for decreasing enrollment projections before using funds to enhance school sites.
7. The district should inspect all sites to ensure compliance with the Williams Act legislation. Each site should include that information in their respective School Accountability Report Card (SARC) to ensure that facility deficiencies are identified.
8. The district should develop a facilities, maintenance and operations succession plan that will enable the district to fill positions of leadership as vacated, identify and develop future leaders and minimize disruption to the strategic direction of the district.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	3
July 2019 Rating:	3
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3





## 7.4 Instructional Program Issues

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### Professional Standard

The LEA's grounds are appropriately landscaped and maintained to enhance an educational environment.

### Findings

1. The district has implemented a team approach to groundskeeping duties in which teams visit sites routinely to maintain the grounds, landscaping, and gardening. Each employee in the Groundskeeping Department has been provided with a workday schedule and an updated job description.
2. Principal interviews indicated varied satisfaction with the grounds/landscaping conditions at their sites. Most believe that the groundskeeping staff is inadequate to maintain the existing facilities at an appropriate level of care. There continues to be a lack of clearly delineated roles and conflicting responsibility between the district landscaping/groundskeeping crew and site staff about who is responsible for removing weeds in flower beds, along buildings and fences, and in the cracks of hard surfaces. As a result, many of these weeds are left untouched. FCMAT observed mixed conditions at many of the sites, with areas that have high public visibility improving in overall appeal, while interior portions of the campuses continue to have weed-abatement issues.
3. The Facilities, Maintenance, Operations and Transportation Department's organizational chart identifies a clear reporting structure and chain of command for the Groundskeeping Department. The reporting structure indicates the deputy chief maintenance and operations officer oversees approximately 26 FTEs, including an administrative assistant, document control specialist, transportation coordinator, custodial supervisor, maintenance supervisor and maintenance and grounds employees. Although span of control refers to the number of subordinates reporting directly to a supervisor, it may also refer to the number of departments a supervisor can reasonably manage. The deputy chief maintenance and operations officer position has management assistance in the maintenance area of responsibility, but according to the organizational chart, groundskeeping and skilled maintenance specialists do not report to the maintenance supervisor.
4. The district provides groundskeepers with appropriate equipment such as mowers, blowers, weed eaters, and turf edgers. During the previous FCMAT visit, many of the tools used by the Groundskeeping Department had recently been stolen from the maintenance yard. The district was in the process of replacing that equipment and changing the way this equipment was stored overnight. However, during a visit to the warehouse and maintenance shop for this review, FCMAT observed many Groundskeeping Department tools that were randomly stored throughout the facility and not secured.



5. The landscaping condition at the sites visited by FCMAT had improved in areas of “curb appeal.” These are areas with high visibility to the public, typically near fence lines, parking lots and front entrances. During site visits, FCMAT only observed the groundskeeping crew working at one site and not on the schedule provided at the beginning of the visit. The groundskeeping crew addressed public areas of the campus and performed minimal work on the interior of the campus. Many site administrators indicated the groundskeeping team schedule was inconsistent. Administrators did not always know their schools’ scheduled day of service and indicated the schedule is routinely changed or adjusted without any notification to site administration. Site principal interviews indicated concerns with adequate staffing, proper training and an antiquated irrigation infrastructure. The conditions continue to prevent significant improvements in the district’s overall landscape condition.
6. Interviews and documents indicate the former chief facilities and operations officer began the 2018-19 school year by making visits to school sites and reviewing the general condition of the schools with principals. Those visits appeared to have stopped by the end of 2018. During the visits, the former chief facilities and operations officer, in conjunction with site principals or office managers, completed an internal document titled School Inspection Report. The document did not include the type of work orders, preventive, or reactive actions that were taken because of the site visit. This document also did not allow a principal or director to document the condition of turf, irrigation, floral plantings, or pruning. FCMAT was not provided evidence of the use of the School Inspection Report during this year’s review.
7. Site administrators reported that the deputy chief maintenance and operations officer routinely visits sites and confers with administrators to solicit feedback regarding site conditions.
8. At the time of FCMAT’s visit, the Groundskeeping Department had five FTE positions. One of these positions had moved from the mowing crew to focus solely on irrigation repairs. FCMAT observed fewer underwatered brown spots in the turf than in prior reviews. While this is an improvement to appearance and health of the grounds, adequate watering may increase the frequency of mowing, weeding, and flowerbed maintenance, changing the number of the groundskeeping positions needed.
9. The district adopted BP 3510–Green School Operations in August 2014, which includes considering sustainability and student health in making landscaping decisions.
10. The district does not have a centralized irrigation control system that aligns with BP 3510, which has the goal to reduce water consumption for irrigation purposes.
11. During prior visits, FCMAT had observed a draft version of a groundskeeping handbook that identified and required a wide range of knowledge of horticulture, pest control, weed abatement, use of pesticides, landscaping methods and performance standards for groundskeeper positions. For this year’s review, FCMAT was not provided an update on the draft groundskeeping handbook, indicating it may not have been completed nor implemented. During site visits, FCMAT observed that both principals and groundskeepers were somewhat familiar with the grounds maintenance and cleaning methods, but a handbook would help facilitate training and accountability.



## Recommendations for Recovery

1. The district should regularly review and update board policies that support the education environment and establish district standards for grounds landscaping and maintenance.
2. The district should regularly review and evaluate the team-scheduling concept to ensure its effectiveness and develop and adopt minimum standards for grounds maintenance and team performance.
3. The district should clearly delineate responsibilities of groundskeeping crew and site staff to ensure all site grounds are adequately maintained and to support staff accountability.
4. The district should review its organizational structure and budget, along with the latest industry tools, to determine if groundskeeping staff and/or equipment should be adjusted to properly complete groundskeeping work. This review should evaluate and recommend an appropriate span of control that allows adequate supervision of the groundskeeping and skilled maintenance workers.
5. It should also evaluate and consider revising the reporting structure, so the skilled maintenance employees report to the maintenance supervisor.
6. The deputy chief maintenance and operations officer should continue routine site visits and discuss issues with the site administration. In addition, those discussions should be memorialized via the work order system or through the School Inspection Report. This creates an audit trail to increase accountability in the Groundskeeping Department. The deputy chief maintenance and operations officer should modify the gardeners' work schedules as needed to address individual site needs. Any changes to the groundskeeping scheduled should be communicated to site administrators.
7. The equipment for the traveling groundskeeping team should be clearly identified, specifically assigned, and securing methods implemented to safeguard it from loss.
8. The district should consider new water conservation landscaping designs at each of its sites to conform to BP 3510. A districtwide water conserving irrigation system should be evaluated and implemented consistently. Centralized irrigation control should be a foundation for this effort.
9. The district should regularly determine the amounts of ornamental and athletic turf maintained to calculate accurate groundskeeping staffing levels. Formulas developed by agencies such as Florida's Department of Education can assist in these calculations.
10. The district should use the work order system or a revised School Inspection Report document that includes information regarding the condition of turf, irrigation, floral plantings, and pruning.
11. When determining the appropriate staffing level, the district should clearly identify the acceptable level of care to ensure the conditions on its campuses meet community

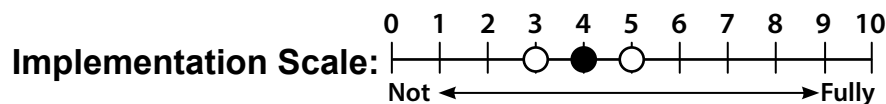


standards and support the district's educational mission. Example descriptions can be found using guidelines from the Association of Physical Plant Administrators.

12. The district should use local vendors, community colleges, and various online trainings and webinars to ensure groundskeeping personnel have up-to-date knowledge and skills.
13. The district should develop, distribute, and use a grounds maintenance handbook to facilitate training and accountability among groundskeeping personnel. Once developed, all groundskeeper staff should receive this handbook and receive training in its content.

## Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	5
July 2016 Rating:	4
July 2017 Rating:	4
July 2018 Rating:	5
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	4





## 8.2 Community Use of Facilities

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### Professional Standard

The LEA has a plan to promote community involvement in schools.

### Findings

1. The district adopted BP 1330 and AR 1330 regarding the community use of facilities, which were last revised in April 2019. The district has also developed a Facilities Use Agreement and application that was updated in March 2021 and a fee schedule that was last updated in October 2019. All are available on the district website.
2. BP 1330 recognizes that district facilities are a community resource authorized for use by community groups if they do not interfere with school activities. The district has made district facilities available to responsible organizations, associations, and individuals of the community for approved and appropriate activities.
3. The district has resumed the community use of facilities following the restrictions that were implemented during the COVID-19 pandemic, although public masking requirements and other safety guidelines have remained in place.
4. The district has continued to receive and approve requests for the use of its facilities from the public and maintains a list of all organizations who have submitted community facility use requests.
5. Interviews with staff indicated the district has approved the use of the asphalt playground areas at Kelso Elementary and Morningside High School, by the Inglewood Educational Foundation to provide commercial parking spaces during local professional sporting and concert events. This use is not allowed under Section #9 Prohibited Activities of the district's Application for Use of School Facilities form. Furthermore, FCMAT was informed that the Foundation has contracted with a third party to organize and oversee the actual parking of vehicles on district property, which may conflict with Paragraph 15 of the district's Facility Use Agreement regarding the Assignment, Subletting, and Subcontracting portion of the agreement.

### Recommendations for Recovery

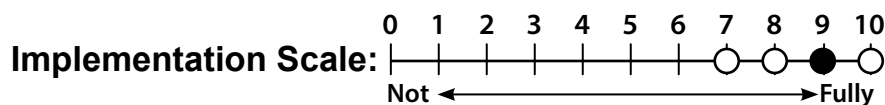
1. The district should review BP and AR 1330 regularly and update as needed to ensure they are still compliant, accurate and applicable. The district should also review and update its Facilities Use Manual and Fee Schedule as needed.
2. The district should continue to facilitate and promote community use of facilities and continue to make available information and its Application for Use of School Facilities form on the district webpage.



3. The district should continue to allow the community use of school facilities within the confines of the latest COVID-19 pandemic safety guidelines regarding the use of public facilities.
4. Use of facilities requirements should be regularly reviewed to ensure that community use does not encroach on school resources and prevent the district from achieving its own established goals and priorities, nor should they be exorbitant and limiting to community use. The district should also continue to maintain community use facilities in good condition and make them reasonably available to the public.
5. The district should enforce the restrictions of community use in alignment with its policies and approved uses. If the district wishes to continue to allow the community use of its asphalt playground areas for commercial parking purposes, it should revise its Application for Use of School Facilities form to allow for this purpose. The district should also review its Facility Use Agreement, specifically Paragraph 15 regarding Assignment, Subletting, and Subcontracting, for any potential revisions necessary to facilitate this type of community facility use.

## Standard Fully Implemented

July 2013 Rating:	7
July 2014 Rating:	8
July 2015 Rating:	8
July 2016 Rating:	8
July 2017 Rating:	9
July 2018 Rating:	9
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	9





## 9.1 Communication

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### Professional Standard

The LEA fully apprises students, staff and community of the condition of its facilities and its plans to remedy any substandard conditions. The LEA provides access to its facilities staff, standards and plans.

### Findings

1. Information on the status of school facilities improvement projects and the condition of school facilities continues to be posted on the district webpage in the IUSD Progress Report, and in the Construction Projects section of the website; however, the Construction Projects section does not appear to have been updated since early 2021. The district also has a link on each of its individual school site webpages titled Construction Projects. However, the link is broken.
2. The district publishes an email-based newsletter that is available via subscription as well as a Communication to Parents, Staff, and Community available on the district website, which contains periodic updates on district facility project activities.
3. The district uses social media platforms Twitter, Instagram, and Facebook to provide periodic district information including updates on construction projects.
4. Since the last FCMAT visit, the district reformed its CBOC, which was initially assembled to provide oversight of its Measure GG bond, into a combined CBOC to also meet the oversight requirement for the Measure I bond passed in November 2020. The district sought members for the reconstituted committee through an application process and combined the new membership of the Measure I CBOC with the existing Measure GG CBOC to form a single committee overseeing the fund expenditures from both bond measures.
5. The district has held four meetings of its reconstituted CBOC since February 2021. Meeting agendas and minutes are posted on the district website, as well as public comment request forms and annual audit information. A review of the minutes available on the district website provided no detailed information as to the information that was presented to the committee by the district other than who made the presentation, or if there were any comments, questions or concerns expressed during the meeting.
6. The district posts its most recent SARC information on the district webpage, which include the sections titled School Facility Good Repair Status and Deficiencies and Repairs. These sections outline the results of the sites' most recent facilities inspections using the state's Facilities Inspection Tool form, which were completed by both the LACOE and Inglewood Unified staff. This inspection determines the school facility's condition status using ratings of exemplary, good, fair or poor condition.

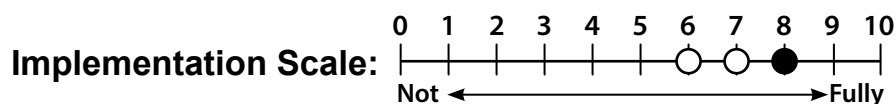


## Recommendations for Recovery

1. Information on the status of school facilities improvement projects and the conditions of school facilities should be updated regularly and posted on the district website in its IUSD Progress Report and Construction Projects reporting.
2. The district should repair the broken link titled Construction Projects and ensure content is accessible on each of its individual school site webpages to provide information to the public regarding the status of projects at each school site.
3. The district should continue to distribute its e-newsletter, as well as maintain its social media accounts on Twitter, Instagram, and Facebook, to help keep the local community informed of its facilities projects.
4. The district should provide more detailed information in the minutes of the CBOC meetings regarding what information is presented to the committee, or any comments, questions or concerns expressed by committee members.
5. The district should continue to publish its SARC forms, which include facility conditions, on its website each year.

## Standard Fully Implemented

July 2013 Rating:	6
July 2014 Rating:	6
July 2015 Rating:	7
July 2016 Rating:	6
July 2017 Rating:	7
July 2018 Rating:	7
July 2019 Rating:	7
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	8
July 2022 Rating:	8





## 10.1 Charter Schools

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### Legal Standard

The LEA meets the audit and reporting requirements of Proposition 39 as it relates to charter schools. (EC 47614; CCR Title 5, Sections 11969.1-11969.10)

### Findings

1. BP 7160 supports the access of charter school students to safe and adequate facilities and was last updated August 20, 2014. Under this board policy, the district is required to make facilities available to eligible charter schools in accordance with law. These facilities are to be contiguous, furnished, equipped, and sufficient to accommodate students in conditions reasonably equivalent to those of students attending other district schools.
2. The county administrator, along with an administrative team, visits each charter school authorized by the district twice per year to review operations and finances. The district no longer uses the services of an outside consultant to monitor and audit the charter schools operating in the district.
3. According to the district, no new charter school applications were received during this review period.

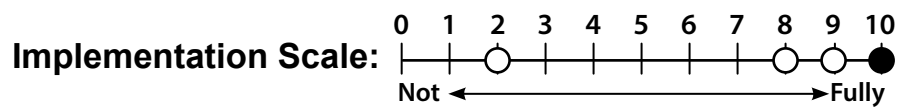
### Recommendations for Recovery

1. The district should continue to evaluate and update BP and AR 7160 to ensure they reflect the latest legal and other requirements of both the state and the district.
2. The district should continue to maintain compliance with BP and AR 7160 supporting charter school facility needs requests.
3. The district should continue to provide continuous educational and fiscal oversight of the charter schools approved by the district.
4. The district should continue to consider facilities use requests and new petitions from charter schools as they are submitted.



## Standard Fully Implemented

July 2013 Rating:	2
July 2014 Rating:	8
July 2015 Rating:	8
July 2016 Rating:	9
July 2017 Rating:	10
July 2018 Rating:	10
July 2019 Rating:	10
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	10
July 2022 Rating:	10





## 13.2 Maintenance and Operations Fiscal Controls

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### Professional Standard

The Maintenance and Operations departments follow standard LEA purchasing protocols. Open purchase orders may be used if controlled by limiting the employees authorized to make the purchase and the amount.

### Findings

1. In previous reviews the district had developed and provided a Purchasing/Warehouse Procedures/Guidelines manual that provided guidelines, policies and procedures governing the Purchasing/Warehouse Department. The manual provided by the district contained some purchasing best practices and interpretations of laws and rules and regulations for school districts. As of the date of FCMAT's fieldwork, this manual had not been provided to either the finance or facilities teams. However, the district has a comprehensive purchasing webpage titled Procurement Services. This webpage offers a workflow process diagram, instructions for submitting purchase orders, and opportunities to request training.
2. According to the senior storekeeper's job description, they are responsible for purchasing all the supplies held in the warehouse.
3. Documentation provided and reviewed indicates that there is a reasonable number of open purchase orders. Open purchase orders are to identify those who are authorized to purchase supplies or noncapitalized equipment on behalf of the district; however, as with prior review findings, they do not consistently contain information identifying authorized users.
4. Interviews with site administration indicated some issues with missing deliveries or deliveries that were shorted supplies. The reason reported was related to supply chain problems that have been common due to the pandemic.

### Recommendations for Recovery

1. The district should ensure a purchasing manual that provides purchasing and inventory management policies, guidelines and procedures is available to all staff and is annually updated with the latest guidance including the maximum bid threshold as determined by the CDE. Effective January 1, 2022, the bid limit was updated to \$99,100.
2. All district purchasing procedures should be communicated to the appropriate staff members. With hiring of new personnel, the district will need to ensure these employees are trained to follow department and district policy and procedures.
3. The district should develop a schedule to routinely review and update the purchasing procedures manual at a frequency that supports the district's processes and coincides with

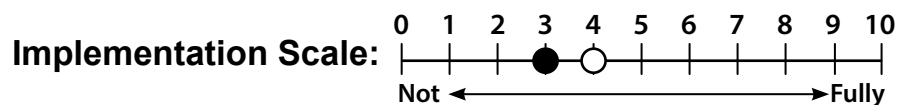


the district's purchasing authority renewal schedule. This schedule should become part of the manual, and assigned staff should update and publish this document accordingly. The date of the update should also be displayed on the manual.

4. The district should continue to maintain a justifiable number of open purchase orders in use by the Facilities, Maintenance, Operations and Transportation Department. Open purchase orders should always indicate who is authorized to purchase supplies or noncapitalized equipment on behalf of the district.
5. The district should provide site and department administrators and managers with training on purchasing best practices and district policy.
6. The district should consider having site administrators or a specific designee included in the proof of delivery process for materials that are delivered to their sites. This will ensure they have firsthand knowledge of discrepancies in material orders and receipts.

### Standard Partially Implemented

July 2013 Rating:	3
July 2014 Rating:	3
July 2015 Rating:	3
July 2016 Rating:	3
July 2017 Rating:	3
July 2018 Rating:	4
July 2019 Rating:	4
July 2020 Rating:	Omitted per SB 98, Section 102 due to COVID-19 pandemic
July 2021 Rating:	3
July 2022 Rating:	3









# **Table of Facilities Management Ratings**







Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.1	LEGAL STANDARD – SCHOOL SAFETY The LEA has adopted policies and regulations and implemented written plans describing procedures to be followed in case of emergency, in accordance with required regulations. All school administrators are conversant with these policies and procedures. (EC 32001-32290, 35295-35297, 46390-46392, 49505; GC 3100, 8607; CCR Title 5, Section 550, Section 560; Title 8, Section 3220; Title 19, Section 2400)	2	2	3	3	5	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	7	7
1.3	LEGAL STANDARD – SCHOOL SAFETY The LEA has developed a comprehensive safety plan that includes adequate measures to protect people and property. (EC 32020, 32211, 32228-32228.5, 35294.10-35294.15)	3	3	3	3	4	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
1.8	LEGAL STANDARD – SCHOOL SAFETY School premises are sanitary, neat, clean and free from conditions that would create a fire or life hazard. (CCR Title 5, Section 630)	2	3	3	2	4	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
1.9	LEGAL STANDARD – SCHOOL SAFETY The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)	1	1	3	2	5	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	7
1.15	LEGAL STANDARD – SCHOOL SAFETY The LEA maintains updated material safety data sheets for all required products. (LC 6360-6363; CCR Title 8, Section 5194)	1	2	2	2	3	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
1.16	PROFESSIONAL STANDARD – SCHOOL SAFETY The LEA has a documented process for issuing and retrieving master and submaster keys. All administrators follow a standard organizationwide process for issuing keys to and retrieving keys from employees.	3	3	4	4	5	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
1.18	PROFESSIONAL STANDARD – SCHOOL SAFETY Outside lighting is properly placed and is monitored periodically to ensure that it functions and is adequate to ensure safety during evening activities for students, staff and the public.	5	5	6	5	5	5	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	7
1.20	PROFESSIONAL STANDARD – SCHOOL SAFETY The LEA maintains a comprehensive employee safety program. Employees are made aware of the LEA's safety program, and the LEA provides in-service training to employees on the program's requirements.	1	1	2	2	5	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
2.2	LEGAL STANDARD – FACILITY PLANNING The LEA seeks and obtains waivers from the State Allocation Board for continued use of any nonconforming facilities. (EC 17284-17284.5)	0	0	N/A	N/A	N/A	N/A	N/A	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	N/A	N/A
2.3	LEGAL STANDARD – FACILITY PLANNING The LEA has established and uses a selection process to choose licensed architectural/engineering services. (GC 4525-4526)	1	1	4	6	6	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	7



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
2.6	PROFESSIONAL STANDARD – FACILITY PLANNING The LEA has a long-range school facilities master plan that has been updated in the last two years and includes an annual capital planning budget.	3	4	6	6	6	6	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	3
2.8	PROFESSIONAL STANDARD – FACILITY PLANNING The LEA has a facility planning committee.	0	0	2	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	0	0
3.1	LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)	2	3	5	6	5	5	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
3.3	LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION All relocatable buildings in use meet statutory requirements. (EC 17292)	2	2	3	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
3.9	PROFESSIONAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION The LEA manages and annually reviews its five-year deferred maintenance plan and verifies that expenditures made during the year are included in the plan.	0	0	N/A	N/A	N/A	N/A	N/A	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	N/A	N/A
3.10	PROFESSIONAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION The LEA's staff are knowledgeable about procedures in the Office of Public School Construction (OPSC) and the Division of the State Architect (DSA).	2	0	2	4	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	5



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
4.1	<b>PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS</b> The LEA maintains a staffing structure that is adequate to ensure the effective management of its construction projects.	1	1	1	5	4	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	5
4.2	<b>PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS</b> The LEA maintains appropriate project records and drawings.	8	8	9	9	9	9	9	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	9	9
6.1	<b>LEGAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA is in compliance with requirement of the Williams case settlement. The governing board provides clean and operable flush toilets for students' use; toilet facilities are adequate and maintained. All buildings and grounds are maintained. (EC 17576, 17592.70-17592.73, 35186; CCR Title 5, Section 631, Section 4683, Section 14030)	3	3	5	3	4	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	6
6.2	<b>LEGAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA has established the required account for ongoing and major maintenance. (EC 17014, 17070.75)	2	2	6	6	6	6	6	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	6	6
6.3	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA uses and maintains a system to track utility costs and consumption and to report on the success of its energy program in reducing the cost of utilities. An energy analysis has been completed for each site.	0	0	1	1	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	1	1



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
6.4	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> To safeguard items from loss, the LEA keeps adequate maintenance records and reports, including a complete inventory of supplies, materials, tools and equipment. All employees who are required to perform custodial, maintenance or grounds work on LEA sites are provided with adequate supplies, equipment and training to perform maintenance tasks in a timely and professional manner.	2	2	2	2	4	6	5	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	5	5
6.5	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.	2	2	3	3	4	6	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
6.6	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA has identified major areas of custodial and maintenance responsibility and specific jobs to be performed. Written job descriptions for custodial and maintenance positions delineate the major areas of responsibility for each position.	2	2	4	4	5	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
6.7	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA has an effective written preventive maintenance plan that is scheduled and followed by the maintenance staff and that includes verification of work completed.	0	0	1	1	1	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
6.8	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA has planned and implemented a maintenance program that includes an inventory of all facilities and equipment that will require maintenance and replacement. Data should include estimated life expectancies, replacement timelines and the financial resources needed to maintain the facilities.	0	0	0	0	2	2	2	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	2	2
6.9	<b>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</b> The LEA has a documented process for prioritizing and assigning routine repair work orders. The LEA has a work order system that tracks all maintenance requests, the employee assigned, dates of completion, labor hours and the cost of materials.	2	2	4	4	5	5	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	4	4
7.2	<b>LEGAL STANDARD – INSTRUCTIONAL PROGRAM ISSUES</b> The LEA has developed and maintains a plan to ensure the equality and equity of all of its school site facilities. (EC 35293)	3	3	3	3	3	3	3	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
7.4	<b>PROFESSIONAL STANDARD – INSTRUCTIONAL PROGRAM ISSUES.</b> The LEA's grounds are appropriately landscaped and maintained to enhance an educational environment.	3	3	5	4	4	5	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	4
8.2	<b>PROFESSIONAL STANDARD – COMMUNITY USE OF FACILITIES</b> The LEA has a plan to promote community involvement in schools.	7	8	8	8	9	9	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	9



Facilities Management Standards		July 2013 Rating	July 2014 Rating	July 2015 Rating	July 2016 Rating	July 2017 Rating	July 2018 Rating	July 2019 Rating	July 2020 Rating	July 2021 Rating	July 2022 Rating
9.1	PROFESSIONAL STANDARD – COMMUNICATION The LEA fully apprises students, staff and community of the condition of its facilities and its plans to remedy any substandard conditions. The LEA provides access to its facilities staff, standards and plans.	6	6	7	6	7	7	7	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	8	8
10.1	LEGAL STANDARD – CHARTER SCHOOLS The LEA meets the audit and reporting requirements of Proposition 39 as it relates to charter schools. (EC 47614; CCR Title 5, Sections 11969.1-11969.10)	2	8	8	9	10	10	10	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	10	10
13.2	PROFESSIONAL STANDARD – MAINTENANCE AND OPERATIONS FISCAL CONTROLS The Maintenance and Operations departments follow standard LEA purchasing protocols. Open purchase orders may be used if controlled by limiting the employees authorized to make the purchase and the amount.	3	3	3	3	3	4	4	Omitted per SB 98, Section 102 due to COVID-19 pandemic.	3	3
<b>Collective Average Rating</b>		<b>2.24</b>	<b>2.59</b>	<b>3.81</b>	<b>3.94</b>	<b>4.65</b>	<b>5.29</b>	<b>5.13</b>	<b>—</b>	<b>4.71</b>	<b>5.16</b>







# Glossary of Acronyms







ACRONYM	DEFINITION
AB	Assembly Bill
ADA	Average Daily Attendance
AON	AON Risk Solutions
AP	Advanced Placement
AR	Administrative Regulation
ASB	Associated Student Body
ASCIP	Alliance of Schools for Cooperative Insurance Programs
BB	Board Bylaw
BEST	Business Enhancement System Transformation
BP	Board Policy
CALPADS	California Longitudinal Pupil Achievement Data System
CalPro	California Professional Employees
CAO	Chief Academic Officer
CAASPP	California Assessment of Student Performance and Progress
CASBO	California Association of School Business Officials
CASH	Coalition for Adequate School Housing
CBEDS	California Basic Educational Data System
CBO	Chief Business Official
CBOC	Citizens' Bond Oversight Committee
CCEE	California Collaborative for Educational Excellence
CCR	California Code of Regulations
CCSS	Common Core State Standards
CDE	California Department of Education
CFR	Code of Federal Regulations
CODESP	Cooperative Organization for the Development of Employee Selection Procedures
CoI	Cycle of Inquiry
COO	Chief Operating Officer
CPSEL	California Professional Standards for Education Leaders
CSBA	California School Boards Association
CSTP	California Standards for the Teaching Profession
CSU	California State University
CTE	Career Technical Education
CTF	California Teleconnect Fund
CUPCCAA	California Uniform Public Construction Cost Accounting Act
Dashboard	California School Dashboard
DELAC	District English Learner Advisory Committee
DOK	Depth of Knowledge
DIBELS	Dynamic Indicators of Basic Early Literacy Skills
DIR	Department of Industrial Relations
DSA	Division of the State Architect
DTAC	District Technology Advisory Committee
EC	Education Code
EDD	Employment Development Department



EEOC	Equal Employment Opportunity Commission
ELA	English/Language Arts
ELAC	English Learner Advisory Committee
ELD	English Language Development
ELL	English Language Learner
ELPAC	English Language Proficiency Assessments for California
EMS	Energy Management System
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
ESSER	Elementary and Secondary School Emergency Relief
FCMAT	Fiscal Crisis and Management Assistance Team
FIT	Facilities Inspection Tool
FMLA	Family Medical Leave Act
FPM	Federal Program Monitoring
FSP	Fiscal Stabilization Plan
FTE	Full-Time Equivalents
GASB	Governmental Accounting Standards Board
GATE	Gifted and Talented Education
GO	General Obligation
HR	Human Resources
HRS	Human Resource System
HVAC	Heating, Ventilation and Air Conditioning
I-Bank	California Infrastructure and Economic Development Bank
IAB	Interim Assessment Block
IBB	Interest-based Bargaining
ICA	Interim Comprehensive Assessment
ICHS	Inglewood Continuation High School
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
IHS	Inglewood High School
IIPP	Injury and Illness Prevention Plan
IMA	Inglewood Management Association
IT	Information Technology
ITA	Inglewood Teachers Association
ITC	Instructional Technology Committee
JPA	Joint Powers Authority
Keenan	Keenan & Associates
LACOE	Los Angeles County Office of Education
LAWA	Los Angeles World Airports
LCAP	Local Control and Accountability Plan
LCFF	Local Control Funding Formula
LCI	Licensed Children's Institution
LEA	Local Educational Agency
LRE	Least Restrictive Environment
MOT	Maintenance, Operations and Transportation



MOU	Memorandum of Understanding
MTSS	Multi-Tiered System of Supports
MYFP	Multiyear Financial Projection
NCLB	No Child Left Behind
NPA	Nonpublic Agency
NPS	Nonpublic School
NSLP	National School Lunch Program
OMB	Office of Management and Budget
OPEB	Other Post-Employment Benefits
OPSC	Office of Public School Construction
OPUS	Online Public Update for Schools
PADC	Principal Apportionment and Data Collection
PAF	Personnel Action Form
PBIS	Positive Behavior Interventions and Supports
PCASC	Personnel Commissioners Association of Southern California
PCC	Public Contract Code
PIP	Performance Improvement Plan
PPM	Policy and Procedures Manual
PTA	Parent Teacher Association
PTO	Parent Teacher Organization
RAD	Reports and Data
RFP	Request for Proposal
RFQ	Request for Statement of Qualifications
RRMA	Routine Restricted Maintenance Account
RSTS	Regional School Transportation Services
Rtl	Response to Intervention
SAB	State Allocation Board
SACS	Standardized Account Code Structure
SARB	Student Attendance Review Board
SARC	School Accountability Report Card
SART	Student Attendance Review Team
SAS	Statements on Auditing Standards
SB	Senate Bill
SCROC	Southern California Regional Occupational Center
SD/OI	Severely Disabled/Orthopedically Impaired
SDS	Safety Data Sheet
SEIS	Special Education Information System
SELPA	Special Education Local Plan Area
SIPPS	Systematic Instruction in Phonological Awareness
SIR	Systemic Instructional Review
SIS	Student Information System
SMART	Specific, Measurable, Attainable, Relevant and Time-Bound
SOP	Standard Operating Procedure
SPI	Superintendent of Public Instruction
SPSA	School Plan for Student Achievement



SSC	School Site Council
SSN	Social Security Number
SST	Student Study Team
SWDs	Students with Disabilities
TBD	To Be Determined
TK	Transitional Kindergarten
UC	University of California
UCP	Uniform Complaint Procedures
USC	United States Code
USAC	Universal Servicer Administrative Company
UTK	Universal Transitional Kindergarten
VARs	Value-Added Resellers
WASC	Western Association of Schools and Colleges