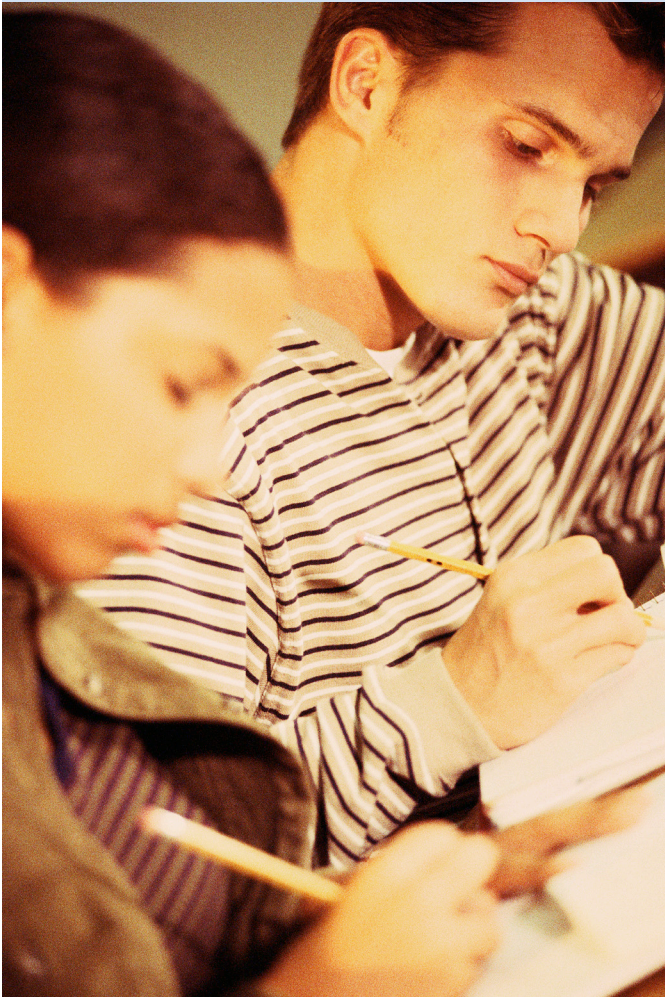# South Monterey County
Joint Union High School District

Comprehensive Review and Recovery Plan

Progress Report

April 2013

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Joint Union High School District

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Introduction and Executive Summary

Introduction

The South Monterey County Joint Union High School District (formerly the King City Joint Union High School District) serves students in grades 9-12 and is situated in the southern portion of Monterey County. The district had a change in state administrators in July of 2012. The new state administrator has publicly stated that his focus will be on pupil achievement to move the district out of program improvement status.

The district encompasses approximately 2,500 square miles. The district operates two comprehensive high schools, one in King City and the other in Greenfield; a dependent charter school located in Greenfield; and a continuation high school located in King City. In 2009-10 the district served 2,075 students; this was approximately 5% fewer than the 2008-09 enrollment of 2,185 students. The district served 2% fewer, or 2028, students in 2010-11, continuing the decreasing trend in student enrollment.

Ninety percent of students in the district are Hispanic or Latino, 7% are white, and 3% are designated as other ethnicities. Much of the student population is disadvantaged: 31.6 % of students are English learners, and 60% are eligible for free or reduced-price meals. The district's annual revenue limit funding per average daily attendance (ADA) was $7,066.34 for 2008-2009, $7,366.34 for 2009-2010, and $7,359.15 for 2010-2011.

On July 23, 2009, Senate Bill (SB) 130 (Denham; co-author Assembly member Caballero) was signed into law. The bill authorized the appointment of a state administrator and provided the district with a $13 million emergency state loan or line of credit. The legislation authorized the Fiscal Crisis and Management Assistance Team (FCMAT) to complete comprehensive assessments of the district and develop recovery plans in five operational areas (listed below) and to file written status reports annually with various entities, including the Legislature, regarding the school district's progress in meeting the recommendations contained in the recovery plans.

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:

Community Relations and Governance

Personnel Management

Pupil Achievement

Financial Management

Facilities Management

This report provides data to the district, the community and the Legislature concerning the district's progress in implementing the recommendations of the recovery plans and building its internal capacity to effectively manage the five operational areas in order to eventually exit state receivership and return to local board governance.

Background

From 2002 until the appointment of the state administrator in July 2009, the district was unable to maintain consistent leadership in key administrative positions. Several superintendents and chief business officials were employed in succession, and at one time the superintendent and CBO were combined into one position to reduce costs. Also at one time, the district's administrative and business services were shared with the King City Union School District (grades kindergarten through eight), leaving one person to fill four key administrative positions for two districts. This organizational structure unfortunately exacerbated the lack of effective decision-making and did not provide the leadership necessary to keep the district financially solvent.

Ineffective governance also contributed to the fiscal crisis and need for state intervention. The governing board's changes in membership and lack of experience and institutional knowledge contributed to a limited understanding of the seriousness of the district's financial condition and the types of fiscal priorities and solutions needed to eliminate the structural deficit.

Under inconsistent leadership and ineffective governance, the district experienced multiple years of financial difficulties, which led to cash insolvency and the need for state intervention in July 2009. An unfavorable ruling from the Public Employment Relations Board (PERB) compounded the district's financial difficulties. The PERB ruling resulted in a retroactive formula-based increase in employee compensation costs and contributed to the district's continued deficit spending.

In 2006, the cost of retroactively applying the compensation formula was estimated at $5.2 million; the ongoing cost was $600,000 annually, a total compensation increase of 11%. The district could not afford to fund the retroactive amount for employee compensation and meet the requirements of Assembly Bill (AB) 1200 that the district maintain a reserve for economic uncertainties and undergo budget certification, so in 2007 the certificated bargaining unit agreed to a negotiated settlement of $1.2 million. The district requested and received a temporary loan from the Monterey County Office of Education in accordance with Education Code sections 42621 and 42622 to fund the settlement because it did not have sufficient cash to fund both the retroactive amount and the permanent ongoing increase to the salary schedule.

The permanent cost increase associated with the certificated staff compensation formula was significant and created a substantial structural deficit. In addition, the classified employee bargaining unit invoked a "me too" clause in its contract, increasing compensation for its members. By fiscal year 2006-07 the district was spending $654 more annually per pupil than it received in revenue. Since that year, the deficit has varied between $450 and $1,987 per pupil annually, and in 2009 the district spent $1,819 more per pupil than it received in revenue.

Beginning in 2007, the Monterey County Office of Education assigned a variety of fiscal experts to the district to provide support to ensure that the district's financial obligations were met and business was conducted appropriately while critical business office positions were vacant. On December 4, 2007, the Monterey County Office of Education declared the district a "lack of going concern" because the district's budget was projected to have a negative fund balance for the current and two subsequent fiscal years. In addition to total employee compensation, other factors contributing to this condition included a developing and serious state budget crisis and the beginning of a period of declining enrollment. A fiscal advisor was assigned to the district in 2008 to help the district achieve fiscal recovery.

In May 2008, the Fiscal Crisis and Management Assistance Team (FCMAT) conducted a fiscal review of the district commissioned by the Monterey County Office of Education. That study included the effect of the PERB decision, and FCMAT's report stated, "Based on the district's projected budget and levels of deficit spending, FCMAT projects that the district will need to make substantial reductions in the multiyear financial projection (MYFP) or the district may require state intervention in the 2009-10 fiscal year."

State Receivership

On July 23, 2009, Senate Bill (SB) 130 (Denham; co-author Assembly member Caballero) was signed into law. The bill authorized the appointment of a state administrator and provided a $13 million emergency state loan or line of credit. The legislation authorized FCMAT to complete comprehensive assessments of the King City Joint Union High School District and develop recovery plans in five operational areas. The bill also required FCMAT to file written status reports annually with various entities, including the Legislature, regarding the school district's progress in meeting the recommendations contained in the recovery plans. SB 130 differs from prior state emergency loans in that it also requires that the recovery plan include specific training for board members and staff who have management and personnel policy-making and advisory responsibilities to ensure that the district's leadership team has the knowledge and skills to carry out their responsibilities effectively. In addition, FCMAT was authorized to assist the state administrator in developing the first multiyear financial recovery plan required under paragraph (1) of subdivision (a) of Section 41327.1 of the California Education Code (EC). FCMAT prepared a multiyear financial projection and cash flow analysis that formed the basis for the financial recovery plan. SB 130 further authorized FCMAT to do the following:

- Assist the state administrator in the initial development of the adopted budget and interim reports.
- Recommend to the state administrator 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 Section 42127.8.

SB 130 further intended that the state superintendent of public instruction (SPI), through the state administrator, work with the staff and 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.

The Return to Local Governance

Senate Bill 130 details the requirements for the district's return to local governance.

The authority of the Superintendent of Public Instruction and the state administrator shall continue until all of the following occur:

a.   The state administrator determines, and so notifies the Superintendent of Public Instruction and the county superintendent of schools, that future compliance by the school district with the recovery plans is probable.

b.   The Superintendent of Public Instruction may return power to the governing board for any of the five operational areas, if performance under the recovery plan for that area has been demonstrated to the satisfaction of the Superintendent of Public Instruction.

c.   The Superintendent of Public Instruction has approved all of the recovery plans and FCMAT completes the improvement plans and has completed a minimum of two reports identifying the school district's progress in implementing the improvement plans.

d.   The state 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.

e.   The school district has completed all reports required by the Superintendent of Public Instruction and the state administrator.

f.   The state administrator certifies that the members of the school board and district personnel, as appropriate, have successfully completed the training specified in subdivision (b) of Section 7 of the bill.

g.   The Superintendent of Public Instruction determines that future compliance by the school district with the recovery plans is probable.

Comprehensive Review Process

In preparation for the first comprehensive review in 2010, FCMAT revised the legal and professional standards to align with industry best practices and with applicable state and federal law, including the California Education Code. The standards used are applicable to all California school districts. Independent and external professional experts from both the private and public sectors assisted in researching, identifying and categorizing the 307 standards used in the assessment process. FCMAT monitored the use of the standards during the assessment to ensure that they were applied fairly and rigorously. In the first comprehensive review, FCMAT measured the district's implementation of the standards, and the initial February 2010 report included recommendations for improvement and recovery related to each standard addressed. 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.

In January 2010 the state administrator, the Director of Fiscal Services Division of the CDE, and FCMAT conferred and selected 144 priority standards from the 307 comprehensive standards initially used to assess the district's condition in the five operational areas. These priority standards are divided among the five operational areas as follows: 18 community relations and governance standards; 26 personnel management standards; 32 pupil achievement standards; 41 financial management standards; and 27 facility management standards. In the annual review process FCMAT assesses the district's progress in the 144 priority areas rather than the initial 307 standards. 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 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 board members, parents, students, staff and the community in a partnership to improve student learning. Each annual comprehensive review report measures progress with a numerical rating and a summary of the district's progress in the identified priority standards. Because recovery is a multiyear process, subsequent reports also include a summary of one previous assessment of the district under each priority standard to give the reader a historical perspective of the district's progress.

A recovery process of this magnitude is a challenging and multiyear effort. The state administrator and the district had to select priority areas on which to focus their efforts during the first and each succeeding year of recovery. Understandably, equal progress is not made in all operational areas. 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 field work. At the time of this report's publication, the district continues to work on a number of the concerns addressed in this report and has thus made progress that is not reflected in this report.

FCMAT acknowledges and extends its thanks to the state administrator, the district's staff and the community for their assistance and cooperation during this ongoing review process.

Study Guidelines

FCMAT's approach to implementing the statutory requirements of SB 130 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 recovery plans in collaboration with other external providers selected using a competitive process. Professionals from throughout California contributed their knowledge and applied the legal and professional standards to the specific local conditions found in the South Monterey County Joint Union High School District.

Prior to 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 recovery plans must be standards-driven. FCMAT has noted positive differences between an objective standards-based approach and a non-standards-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 recovery plans developed for the district.

To participate in the review of the South Monterey County Joint Union High 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 South Monterey County Joint Union High School 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. Consultants 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.

1. All elements of the standard are fully and substantially implemented and are sustainable. (Scaled score of 8)

2. All elements of the standard are fully and substantially implemented and have been sustained for a full school year. (Scaled score of 9)

3. 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 recovery plans for the district. This report presents findings and recovery 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 recovery 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 recovery plan.

4. Empower Staff and Community

Senate Bill 130 requires that the recovery plan include specific training for 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 their responsibilities effectively. The success of the recovery 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 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 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 recovery process emphasized this. The California Department of Education (CDE), city and county interests, and professional organizations have expressed a desire to assist and participate in the district's recovery.

Recovery Plan Implementation

The initial February 2010 report assessed the district using 307 professional and legal standards in five areas of school district operations. The scaled scores for all of the standards in each operational area provided an accurate measure of the district's status regarding recovery at that time. Each standard was measured for completeness and a relative scaled score from zero (not met) to 10 (fully met) was applied. An average of the scores for each operational area was determined. The averages of those scaled scores became the baseline of data against which the district's progress could be measured over time.

For the subsequent annual progress reviews, a smaller subset of these standards was selected by FCMAT in consultation with the California Department of Education (CDE) and the appointed state administrator. One hundred forty-four priority standards were selected as having the most probability of assisting the district with recovery if addressed successfully. The selected standards are identified in the tables of standards in later sections of this report, and are the focus of each annual review.

The South Monterey County Joint Union High School District is not required to reach a scaled score of 10 in the priority standards, but the district is expected to make steady progress that can be sustained. It is reasonable to expect that the district can reach an average rating of at least a six in each of the five operational areas, with no individual standard rated at less than a four. In collaboration with the California Department of Education, FCMAT established the following criteria to measure the district's progress. When the average score of the subset of standards in an operational area reaches a level of six, and it is considered to be substantial and sustainable, and no individual standard in the subset is below a four, FCMAT will inform the state superintendent of public instruction (SPI) that this particular condition has been met and recommend that this operational area could be returned to the South Monterey County Joint Union High School District governing board. The final authority to return governance to the district board lies with the SPI.

The ultimate return of legal rights, duties and powers is based on the SPI's concurrence with the assessment of his administrator designee and FCMAT that the district's future compliance with the improvement plans and the multiyear financial recovery plan is probable.

The above-referenced subset of priority standards is the focus of the ongoing annual progress reviews conducted in the district. Although all 307 professional and legal standards used in the comprehensive assessment process are important to any district's success, focusing on this

identified subset of 144 priority standards will enable the district to focus its efforts and more quickly achieve a return to local governance.

FCMAT, with the collaboration of the California Department of Education and the state administrator, identified the following subset of 144 priority standards in the five operational areas that are to be reviewed during each annual progress review.

      18 standards in Community Relations and Governance

      26 standards in Personnel Management

      32 standards in Pupil Achievement

      41 standards in Financial Management

      27 standards in Facilities Management

A progress narrative for each of these standards is provided in later sections of this report. These standards are also identified in the table of standards displayed at the end of each operational area section.

FCMAT will assess the district's progress annually in each of the five operational areas and determine whether each operational area, subject to the criteria, could be returned to the governing board of the school district on an incremental basis. The ultimate decision for the return of legal rights, duties and powers to the governing board will be based on the SPI's concurrence with the assessment of his administrator designee and FCMAT that the district's future compliance with the improvement plans and the multiyear financial recovery plan is probable.

The average of the subset of standards in each operational area is indicated below. The ratings from the initial February 2010 Comprehensive Assessment and Recovery Plan provided a baseline of data against which the district's progress can be measured over each period of review.

February 2010:

Community Relations/Governance: average rating 0.89, with 17 standards under a 4.

Personnel Management: average rating 0.92, with 26 standards under a 4.

Pupil Achievement: average rating 1.38, with 31 standards under a 4.

Financial Management: average rating 1.54, with 39 standards under a 4.

Facilities Management: average rating 1.04, with 25 standards under a 4.

March 2011:

Community Relations/Governance: average rating 2.83, with 13 standards under a 4.

Personnel Management: average rating 2.69, with 16 standards under a 4.

Pupil Achievement: average rating 1.87, with 31 standards under a 4.

Financial Management: average rating 2.93, with 23 standards under a 4.

Facilities Management: average rating 2.15, with 20 standards under a 4.

March 2012:

Community Relations/Governance: average rating 5.11, with 1 standard under a 4.

Personnel Management: average rating 4.27, with 7 standards under a 4.

Pupil Achievement: average rating 2.87, with 25 standards under a 4.

Financial Management: average rating 3.39, with 21 standards under a 4.

Facilities Management: average rating 4.85, with 6 standards under a 4.

March 2013:

Community Relations/Governance: average rating, 6.78, with no standards under a 4.

Personnel Management: average rating 5.88, with 1 standard under a 4.

Pupil Achievement: average rating 4.50, with 5 standards under a 4.

Financial Management: average rating 3.54, with 20 standards under a 4.

Facilities Management: average rating 5.63, with 4 standards under a 4.

Table of Summary of Scores

Operational Area	February 2010		March 2011		March 2012		March 2013	
	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4
Community Relations/Governance	0.89	17	2.83	13	5.11	1	6.78	0
Personnel Management	0.92	26	2.69	16	4.27	7	5.88	1
Pupil Achievement	1.38	31	1.87	31	2.87	25	4.50	5
Financial Management	1.54	39	2.93	23	3.39	21	3.54	20
Facilities Management	1.04	25	2.15	20	4.85	6	5.63	4

Study Team

The study team was composed of the following members:

For FCMAT

Anthony L. Bridges, Deputy Executive Officer

William Gillaspie, Ed.D., Deputy Administrative Officer

Eric D. Smith, Fiscal Intervention Specialist

John Lotze, Technical Writer

For Community Relations and Governance

Bill Gillaspie, Ed.D., FCMAT Deputy Administrative Officer

Robert Rice, Ed.D., Retired Superintendent, FCMAT Consultant

For Personnel Management

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For Pupil Achievement

Patricia Alexander, Administrator (Retired), Kern County Superintendent of Schools, FCMAT Consultant

Nancy Sullivan, Deputy Operations Officer, California School Information Systems (CSIS), FCMAT Consultant

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For Financial Management

Diane Branham, FCMAT Chief Management Analyst

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Julie Auvil, FCMAT Fiscal Intervention Specialist

For Facilities Management

John Von Flue, FCMAT Fiscal Intervention Specialist

Dean Bubar, Assistant Superintendent, Administrative Services, Los Banos Unified School District, FCMAT Consultant

Executive Summary

FCMAT's current assessment of the South Monterey County Joint Union High School District (formerly the King City Joint Union High School District) indicates that the district continues to make progress in every operational area, though not in every standard. In a recovery model it is expected that the district will not make progress uniformly in all areas. The new state administrator and district selected and focused on areas of the highest concern and dedicated significant resources to recovery in those areas. The comprehensive review process measures progress on 144 selected priority standards annually. It is evident that the district initially focused its efforts on achieving financial stability, specifically renegotiating the collective bargaining agreements. The district developed systems to hold staff accountable and track progress in some departments. These systems are in various phases of development and implementation; however, they are not consistently communicated to the staff prior to implementation.

It is commendable that the district continues to make progress despite continuing state budget concerns. The district has addressed a number of outstanding concerns such as significant audit findings, program improvement status, coordinated program management findings, and Western Association of Schools and Colleges (WASC) accreditation of its comprehensive high schools, its continuation high school and its newly opened independent study charter school.

The district hired additional district and site administrative staff to rebuild infrastructure and systems to increase accountability. Although the district has provided increased opportunities for professional development, it has not yet implemented a comprehensive program based on an assessment of student outcomes. The district made progress in facilities management, reorganizing positions and improving the safety and appearance of its sites.

Employee morale remains low in some departments but continues to improve. The board, community and staff recognize that positive change has and will continue to occur. However, certain members of the district remain skeptical, expressing the view that changes were not sustainable and that once the state administrator departs, the district would return to its previous status.

Internal and external communications are more consistent and frequent; however, communication needs to increase in frequency, modes, and audience so that staff, students, parents and the community understand the changes being implemented and the district's progress toward recovery. In addition, this will strengthen the community's and staff members' understanding of the depth and span of changes, and the fact that those changes are systemic rather than isolated to the state administrator, district office and administration.

The district has become more focused on the best interest of students, and decisions are based on student needs. More board meetings, staff meetings, and energy are directed toward student outcomes; however, employee issues, including collective bargaining, continue to require considerable administrative time.

The districtwide Academic Performance Index (API) is 676, a decrease of 19 points from 2011. The district's API is 68 points below the county average and 112 points below the state average. The district increased the number of strategic and intervention classes to further improve student achievement.

This report contains numerous findings and recommendations for recovery in five major operational areas. Prioritizing these recommendations and redirecting resources to address these issues will be essential to recovery. FCMAT found evidence that the district was developing operational systems in many areas of district management. When any system change is implemented, it is critical to provide strong guidance and monitoring through frequent communication to sustain momentum; however, in some cases FCMAT found that communication was lacking. Themes repeated throughout this report include the need to continue developing effective operational systems, building infrastructure and tools, building internal staff capacity, and communicating and training staff throughout systems change implementation so that all responsible and affected staff understand their roles and become committed to the systems change.

Overarching Issues

The district had a change in state administrators in July of 2012. The new state administrator has publicly stated that his focus will be on pupil achievement to move the district out of program improvement status.

Although the district has made significant progress in reducing its expenditures, it continues to deficit spend, requiring annual draws against the state loan. The balance of the $13 million state loan may be exhausted in 2013-14. The district's most recent general fund cash flow projection, dated September 5, 2012, indicates that the district will draw another $1.5 million in fiscal year 2012-13, and staff anticipate drawing the remaining funds in 2013-14 and/or using them for repayments due to audit findings. The ongoing costs to the district's general fund to cover the annual debt service payment and the high costs associated with prepayment constrain the district's fiscal recovery efforts. The district will need a solution such as a restructuring of the loan, or an amendment to Senate Bill (SB) 130.

Restoring the district's financial stability is paramount. At the time of fieldwork, the district was scheduled to lose its chief business official (CBO), who was qualified. Subsequent to fieldwork, the district hired a new candidate for this position, who is expected to start work with the district on June 1, 2013.

Increasing internal leadership capacity is necessary for the district's return to self-governance and continuing recovery. As the board members complete more of their Masters in Governance training, the state administrator should involve them to a greater extent in decisions, in conjunction with other district leaders.

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

The full report includes all of 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. The ratings indicate the district's status during the rating period of September 2011 through October 2012.

The assessment team began work in the district in August 2012 and concluded in October 2012. The formal report is presented to the district in April 2013. The district addressed some preliminary findings reported during the on-site assessment process.

Community Relations and Governance

The community relations and governance section of this report assessed the district based on 18 FCMAT standards in seven categories. The district received a mean rating of 6.78, with no standards not implemented; 15 standards partially implemented, with a rating of one through seven; and three standards fully implemented, with a rating of eight through 10. The February 2010 average scaled score for the identified subset of priority standards was 0.89. The March 2011 average scaled score was 2.83. The March 2012 average scaled score was 5.11, and the March 2013 average scaled score is 6.78, demonstrating continuing improvement over time.

Communications

The previous three comprehensive reports identified board members' limited experience, training, and knowledge in governance as factors contributing to the district's need for intervention and as a significant hindrance to the district's recovery. The district continues to make substantial progress in providing essential training to board members in governance and communication. Board members clearly understand their roles and responsibilities, and the extent of their authority as members of the board. Board meetings are held in accordance with the Ralph M. Brown Act, and members and attendees follow board policies regarding communications. Board members regularly consult with the state administrator when they have a question about district policy, student or personnel issues. Board members generally refrain from speaking outside of their authority, and instead refer matters to the state administrator.

Communication is essential to the success of any organization. Although the state administrator provides consistent communication with the staff through monthly newsletters, the frequency and scope of communication could be increased to effect systems and culture change.

The district has developed a comprehensive plan that identifies goals for external and internal communications, target audiences, strategies for reaching those audiences, and an accountability system for monitoring and implementing the plan. Elements of the plan include a system of communication protocols and procedures for ongoing and timely two-way communication between the district office and all staff.

The district has established advisory committees, such as a budget committee and a facilities management committee, that meet monthly to advise the district's administrators and board regarding priorities and issues.

The district's name was changed last year from King City Joint Union High School District to South Monterey County Joint Union High School District. The purpose of the name change was to be more geographically inclusive of Greenfield High School and the elementary feeder districts. The name change also serves to lessen any stigma associated with the district being in state receivership. Public hearings were held prior to the name change.

The news media receives board meeting agendas and board packets, and agendas and minutes are posted on the district's website, which has been recently updated.

The state administrator and representatives of the local California State Employees' Association (CSEA) chapter meet monthly, and the working relationship with the CSEA has improved. The CSEA acknowledges and appreciates the monthly meetings, and has asked for more meetings.

The working relationship with the South Monterey County Joint Union High School District (SMCJUHSD) teachers' association leadership has improved significantly as well.

The district's board vision statement provides a framework to develop goals for student achievement. The district should monitor and hold staff accountable for progress toward the stated goals. It should determine the effectiveness of implemented strategies and make adjustments based on an ongoing assessment of student outcomes. Finally, it should review and revise its vision statement annually to ensure that it is consistent with the recovery plan and based on the needs of students, staff and the community.

Parent/Community Relations

The district is making progress engaging parents and the community in supporting the schools. School site administrators increased the frequency and number of parent meetings, and the district improved its website to improve communications with parents. However, parents, the media and community members continued to express their need for more frequent communication from the district.

The district distributed a parent satisfaction survey to the community. Survey results are in but have not been tabulated or analyzed. The purpose of the survey is to determine what the community wants and how they want to receive information. The survey also gives the community the opportunity to provide feedback regarding communication, governance, curriculum and school climate.

The district has taken a proactive and systematic approach to reviewing and revising board policies. The staff is more positive about the district's direction, and relationships and the work

environment have improved; however, the state administrator is rightly concerned that some staff and community members may be losing sight of the district's continuing financial difficulties. The state administrator has to constantly remind people that improving relationships and the work environment does not necessarily affect the district's fiscal problems.

The district should make a strategic effort to engage more students, parents and community members in addressing district goals. During recovery the district should conduct regular forums with staff, parents and interested community members, and should engage local media in scheduled meetings, particularly when considering a change to district policy or longstanding practices that affect the larger community.

During this review period, there is evidence of systematic communication at school sites regarding monthly staff meetings, state testing and reporting (STAR) meetings, site council meetings, English learner advisory committee (ELAC) meetings, department meetings, and other key meetings and events. The ELAC committee is a legal requirement for English learner programs that receive categorical funds.

High school websites allow parents to access their child's grades, attendance and discipline records online. Parents who do not have a computer or internet access can also receive this information by mail.

The Alert Now telephone message system informs parents when their child is tardy or absent from a class or school.

There are advisory committee meetings at the district level to encourage communication and involvement of staff and the community in understanding the district's programs, operation and status. There is a budget committee, a facilities committee, and a technology committee, and a diversity committee is being established. The district has a chart that shows the composition, membership and contact information for each committee. ELAC and curriculum committees have recently been added to the list of committees.

Policy

The board systematically updates board policies under the leadership of the state administrator, who addresses the review and update of board policies at each board meeting, and is using the California School Boards Association's (CSBA's) GAMUT system as a guide in this process. The district is not using the GAMUT online system to post new board policies, though it is posting its board policies on its website. Board members are now involved in policy development, and they review and have copies of the new board policies. The policy development and review process includes review of policies at a public board meeting as well as a plan for broadly communicating changes to board policy.

The district provides training to administrative staff responsible for implementing new policies; however, perhaps because of the number of revised policies, the district has not consistently provided communication to staff members who are affected by policy change.

Board Roles/Boardsmanship

The state administrator provides status reports to update the community regarding the district's state loan and receivership issues, and there is no evidence of any improper communication by any current board member.

There are two new board members; one has completed all of the California School Boards Association's Masters in Governance training and the other still needs to complete part of the training. There has been improvement in staff and board communication and in media coverage. There has been a significant effort to use media coverage of board meetings and school programs more effectively. The state administrator meets with the press following each monthly board meeting. In addition, the state administrator is a Rotary member and speaks at both the Greenfield and King City Rotary meetings. The CSBA Masters in Governance training provided to the board during the past year includes media relations training.

Board Meetings

Board meetings are held in a public forum and the entire board participates, but the state administrator has sole authority in all matters. The district has adopted a schedule of board meetings and a calendar for 2012-13 and has published and distributed this information throughout the district and to local media and the community. Board meeting agendas are posted on time and meet legal requirements. Meetings include opportunities for public input, and both open public board meetings and closed sessions are conducted in accordance with the Ralph M. Brown Act.

Board members review the meeting agenda and support materials prior to board meetings, and ask questions that illustrate their interest in and familiarity with the material. To be better prepared, board members contact the state administrator with any questions they may have regarding the material prior to the meeting.

Prior to the appointment of the state administrator, the board did not consistently adhere to Board Bylaw 9323, Meeting Conduct, revised and adopted September 9, 2009. Board meetings are now orderly and provide an opportunity for public input and for the board to conduct its business.

Personnel Management

Introduction

The district's human resources department plays an important role in students' academic and co-curricular success by providing an effective and efficient recruitment, selection, and orientation and training program for all district employees. In addition, personnel management plays a vital role in the district's fiscal recovery. With 79.38% of its unrestricted general fund expenses going toward employee compensation, it will be difficult for the district to regain fiscal solvency without increased operational efficiencies in this area.

The personnel management section of the comprehensive review assessed the district based on 26 priority standards in eight categories. The human resources department has made measurable progress during this reporting period. The February 2010 average scaled score for the subset of priority standards on which the department's recovery plan is based was 0.92. The March 2011 average scaled score was 2.69, demonstrating significant improvement. The March 2012 average scaled score increased to 4.27, indicating continued improvement and increased operational efficiencies in the human resources department. The March 2013 average scaled score increased to 5.88, demonstrating that the department is implementing most elements of the standards and that changes are becoming systematic. For this March 2013 review, no standards were not implemented; 24 standards were partially implemented, with a rating of one through seven; and two standards were fully implemented, with a rating of eight through 10.

One of the most noteworthy improvements was in the area of operational procedures. The human resources department has made substantial progress in developing a department procedures manual. The manual is not yet fully developed but describes many essential human resources procedures including, but not limited to, recruitment and hiring, contract management and grievance processing, and processing of personnel requisitions. The manual also contains an annual calendar of required monthly human resources activities and best practices.

Organization and Planning

In June 2010 the district hired an assistant superintendent of educational services/human resources, who served as the chief personnel officer. The assistant superintendent was appointed as the state administrator for the 2012-13 school year. His former position will not be filled because a reorganization of the human resources and business divisions is being contemplated. Based on a comparative analysis with similar districts, the district is understaffed in human resources and payroll. The district needs to increase staffing in human resources and business and will need to reorganize functions to ensure the most effective use of existing and any added full-time equivalent positions. Any reorganization of the district office should ensure that essential human resources functions are reallocated, that necessary revisions to job descriptions are made, and that the functional organization chart is updated to reflect any changes.

Employee Recruitment and Selection

Prior to fiscal year 2008-09, the district did not have a procedure to routinely monitor teacher assignments for appropriate credentialing. Since that time, the human resources administrator has reviewed the master schedule annually to identify any misassignments. The Williams Assignment Monitoring Review of the district indicated seven misassignments in 2009-10 but just one misassignment in 2011-12, which was resolved through a board resolution and application for a limited assignment permit.

The department continues to improve hiring procedures by ensuring that authorized positions are based on enrollment projections and the needs of each school as indicated by the master schedule. The hiring process now includes a procedure to ensure that each applicant and candidate selected for hire is appropriately credentialed before a position is offered; this includes ensuring that the individual possess authorizations allowing them to instruct English language learner (EL) students.

The human resources department developed enrollment projections for the 2012-13 school year in collaboration with the business services and curriculum and instruction divisions. Instructional program changes were considered when developing the master schedule and identifying staffing needs. These procedures are becoming systematic. The district's layoff, reassignment and recruitment decisions were based on identified needs. The recruitment plan is included in the human resources department procedures manual. However, the plan does not include an action plan that identifies key recruitment tasks, personnel responsible for each task, and implementation dates. In addition, it does not identify a timeline for key recruitment-related tasks such as developing the master schedule and identifying particular kinds of certificated services to be reduced for the subsequent school year. The department continues to make progress with regard to recruitment; however, a written comprehensive plan is still needed.

Evaluation/Due Process Assistance

The district continues to ensure that evaluations of certificated staff are completed as required by the collective bargaining agreement. Considerable progress was made during the 2011-12 school year in the area of classified evaluations. Based on their performance, the employment of six probationary certificated employees and two site administrators was not continued, indicating that the district takes seriously its responsibility for deciding whether to grant permanent employment status.

Although the new evaluation system for certificated employees is more rigorous and helps the district make important decisions about whether to grant permanent employment status, it does not include a process that offers struggling employees meaningful assistance and support. An improvement plan should include, but may not be limited to, specific information about the following: what the employee needs to change; what evidence will demonstrate progress toward meeting the desired goals; when progress will be measured; who will support the employee and monitor progress; resources needed to ensure success; and the date of the next review.

Employer/Employee Relations

The district presented its initial proposals to the certificated and classified employee bargaining units at the April 17, 2012 regular meeting of the governing board. At the time of FCMAT's fieldwork, the district and the classified employee bargaining unit were bargaining, and several sessions were being scheduled with the teachers' association. The district and employee groups need to identify additional reductions prior to the start of the 2013-14 school year to avoid the need for an additional emergency appropriation. Because of this, if agreements cannot be reached by March 2013, the district should consider declaring impasse in order to provide sufficient time for an agreement to be reached through mediation or, if necessary, be prepared to impose concessions before the start of the 2013-14 school year.

Pupil Achievement

The FCMAT pupil achievement team assessed progress on 32 priority standards in six categories (planning process, curriculum, instructional strategies, assessment and accountability, professional development, and data management/student information systems). Priority standards selected are those that will have the greatest impact on improving student achievement. The mean rating for the subset of priority standards in the February 2012 report was 2.69. The mean rating on the standards in this 2013 report is 4.50. Thirty-one standards were partially implemented, with a rating of one through seven; and one standard was fully implemented, with a rating of eight.

Progress is being made on meeting pupil achievement standards, as indicated by the change in mean rating. The pupil achievement report for this fourth comprehensive review emphasizes all of the recommendations from the initial, second, and third comprehensive reviews and provides some additional detail.

The most notable difference between this annual review and previous reviews is the awareness of the details of the FCMAT report by all stakeholders and the observable and documented attention to implementing recommendations that have the greatest impact on teaching and learning. There was an atmosphere of cooperation and support for change by the large majority of teachers. Not everyone agreed on the details, but all agreed on the need to make some changes. There were

numerous occasions on which mutual respect was demonstrated between administration and staff. The leaders of the district and the schools have the knowledge and skill to carry out a plan to significantly improve student achievement, and they have the support of the staff, the board and the community.

The following topics recur throughout the pupil achievement findings and recommendations. These topics also appear in the current educational research on what works in improving student achievement, most notably in the work of Richard DuFour, Rebecca DuFour, and Robert Eaker, outlined in their book, *Whatever It Takes: How Professional Learning Communities Respond when Kids Don't Learn*, published by Solution Tree (2004). This book is filled with examples of the kind of work that South Monterey County Joint Union High School District is doing and needs to continue to do to reach its goal of high achievement for all students.

Systems

The district continues to make progress in developing various elements of a system that will provide an instructional program that meets the needs of all of its students. The district has an LEA Plan, Single plans for student achievement (SPSAs) have been developed at each site, a Title III plan is being implemented, WASC accreditation studies and reports are available for planning, and the district is providing resources to support these plans to the extent that they are available. The district has set clear goals, provided professional development, and made structural changes that will help support the implementation of these plans.

The focus so far has been on developing systems and processes to support student achievement, and the district acknowledges that there is more work to be done. The next step is to bring all of these elements together into one system of plans and guiding documents that have an unrelenting focus on student learning. All of these plans need to be guided by a clear and simple mission statement that communicates a commitment to do whatever it takes to ensure that every student is successful. The mission statement should be succinct and simple enough that everyone in the district, including students and parents, can repeat it.

The district has taken the first steps in collaborative efforts with its feeder districts. They are working on shared professional development focused on common core standards, English learners, and Algebra. Successful collaboration and cooperation with feeder districts significantly affects the district's effort to improve student achievement. These are the schools that prepare students for high school, and families and local communities are affected by the quality of both the elementary and high school systems.

The district should use the collective knowledge and skills of the its teachers, administrators, support staff, students, and parents to build the system. When challenges arise in the implementation of the system, those who helped build it will become the best problem solvers.

Learning for All Students

The district is actively addressing the policies and practices that need to be in place to ensure that every student has the opportunity to learn and does learn. Everyone in the district is working hard to make sure that they are doing the right things to address students' learning needs. What is needed now is to shift the emphasis from what the adults are doing to what the students are learning. Many positive actions have been taken to improve instruction; however, the district lacks a system of monitoring student progress that is flexible enough to ensure early and appropriate intervention for students who are struggling. The interventions the district provides

are long-term in nature and do not address the need to respond early and systematically when students first show signs of failure. For example, an early intervention system would make a difference among the students who enter the alternative education programs, almost all of whom are many credits short and not on track for graduation; and it would help the majority of English learner students, who continue to score below average by all measures.

The district is exploring ways to better serve the needs of English learners and has provided all teachers with training in Constructing Meaning strategies a first step. Addressing the learning needs of these students must be a high priority. The district currently has 551 English learners, 69% of whom are at language level 1-3 and thus require English language development (ELD) services. Without appropriate instruction, these students will not have the knowledge and skills to be successful in high school; they remain in ELD and specially designed academic instruction in English (SDAIE) courses and often never have the opportunity to move to the regular and higher level courses that allow them to get a diploma and proceed to post-secondary education. Students, parents and teachers gave FCMAT many examples of how placement in ELD and SDAIE courses becomes permanent for many of these students and how this causes many students to give up on earning a diploma or even finishing high school.

Intervention systems in highly effective schools and districts are flexible and allow the district to provide assistance at the first sign that a student may not be on track to pass a required course. There are many examples of such systems that the district could use as models, Response to Intervention and Pyramid of Interventions are the most common systems. Some systems require no additional funding or time. Any system of intervention will only be as effective as the district's system of consistent monitoring and assessment of student progress and the willingness of everyone to take collective responsibility for the academic success of these students. Solutions to a shortage of resources and time can often be found by tapping the collective knowledge of teachers and administrators in a team approach.

The district is effectively addressing the need to provide credit recovery options for students. The district's graduation rate and numbers of students eligible for admission to the California State University and University of California systems demonstrates the urgency for the district to find solutions. Careful consideration needs to be given to the number of qualified teachers of record available to oversee the online credit recovery courses and the number of students that can be served in this way. When resources allow, an increase in counseling support should be considered. Students are concerned that there is not enough counseling time available for all of the students that need help preparing for graduation and college.

Accountability

The district has developed and implemented a teacher evaluation system that is supported by teachers and administrators. This system is aligned with the California Standards for the Teaching Profession, which closely align with the skills and knowledge required to deliver the Essential Program Components (EPCs) required by the state under Title I Program Improvement. The district is monitoring teacher evaluations to ensure that they are done on schedule.

Because professional development is a substantial investment of time, resources, and energy, it is important that it be fully implemented and monitored. For professional development to have a significant effect on student learning, 90% implementation is needed; anything less has little effect on student outcomes. District and site administrators and coaches are monitoring

classrooms frequently to ensure that full implementation occurs. The focus for monitoring or classroom visits should be given to teachers each week and feedback provided. For example, if administrators are monitoring for language objectives, let teachers know ahead of time and give them collective feedback on the progress they are making in implementing that strategy. Monitoring also helps identify any additional support and training needed to ensure successful implementation. The district is providing coaches and has skilled administrators who can provide the additional support and training.

The district has made good progress in using collaboration time by providing structure and monitoring. Most teachers feel this is an improvement and appreciate that the work done during this time is primarily focused on improving teaching and learning. Training in developing professional learning communities (PLCs) was provided for administrators and teachers, and collaboration time PLCs are being implemented. The district's goal is to progress toward the PLCs setting their own agendas. Having a complete assessment system with data available in a timely manner will increase the effectiveness of the PLCs.

There was evidence that the work accomplished during collaboration time is having an effect on classroom practice. Teachers are using a broader range of strategies than was observed in past reviews. Interviews and discussions with teachers and administrators were more focused on what is happening in the classroom and on practices that increase learning. There is an observable increase in common language regarding student achievement and a more collaborative spirit and common understanding among staff members.

Leadership

Site principals are clear regarding their roles as instructional leaders at their schools and are well versed in teaching and learning and what it takes to ensure that students are successful. The faculty, support staff, parents and students spoke positively in support of the new principals. They are all hopeful that these administrators will stay and provide some much desired consistency and stability in school site leadership. It is imperative that the district's administration continue to provide full support for these new school administrators and allow them to focus on improving student achievement.

Because the district is small and is experiencing fiscal challenges, it is important to use the full expertise of all staff members in providing leadership. The development of teams of problem solvers and teacher leaders is an effective way to address many of the recommendations outlined in this report. There is evidence that this is taking place in providing professional development and implementing PLCs. Teams, committees, and work groups can all be effective in solving problems, sharing the workload and building a collaborative environment. However, to produce results they must be given meaningful tasks, empowered to make decisions, and supported by the district. There are very few challenges to improving student achievement that existing staff cannot address using their collective knowledge and skills. Teamwork is what drives a professional learning community.

There are districts and schools across the state that are demographically similar to South Monterey County Joint Union High School District and that are making great strides in improving achievement for all of their students. Although different in size, the background of the students they serve, and geographical location, they all share a commitment to doing whatever it takes to ensure that all of their students learn. The district should learn from these other districts,

study their data, visit their sites, visit their websites, and benefit from what they have found to be effective practices.

District and site administrators and teachers are concerned that few parents and families are actively involved in their children's education. There are very few parents who do not want their children to be successful in school. However, getting busy parents to actively engage in the schooling of their children is a large but important task. The parents and students interviewed for this review shared that many parents do not view themselves as capable of contributing in a meaningful way. Finding ways to help parents and families feel welcome and valued and understand how they affect their child's performance in school is a worthwhile effort for school leaders. A task force that includes teachers, parents, students, administrators and community leaders would be a good place to begin finding solutions to this issue.

Authors Richard and Rebecca DeFour and Robert Eaker, in the book *Whatever it Takes: How Professional Learning Communities Respond When Kids Don't Learn* (2004, Solution Tree Publishing), state the following:

> The most powerful fuel for sustaining the initiative to improve a school is not the desire to raise test scores but rather the moral imperative that comes with the desire to fulfill the hopes of those we serve and those with whom we work.
>
> DuFour, R, DuFour, & R., Eaker, R. (2004). Solution Tree.

Financial Management

The financial management section of the comprehensive report assessed the district based on 41 FCMAT standards in 18 categories. The district received an average rating of 3.54 with one standard not implemented; 39 standards partially implemented, with a rating of one through seven; and one standard fully implemented, with a rating of eight through 10. The February 2010 average scaled score for the subset of priority standards was 1.54. The March 2011 scaled score was 2.93, the March 2012 score was 3.39, and the March 2013 score was 3.54, indicating slight improvement.

Because of the district's fiscal insolvency, the state Legislature approved a $13 million emergency loan for the South Monterey County Joint Union High School District (formerly King City Joint Union High School District) in June 2009. The loan was funded through a bond sale by the California Infrastructure and Economic Development Bank (I-Bank). Of the $13 million, the district drew $5 million in fiscal year 2009-10, $4 million in 2010-11, and $1.5 million in 2011-12. All remaining loan proceeds, including unused funds from the previous draws, have been deposited in fund 17, Special Reserve Fund for Other than Capital Outlay Projects. The district's most recent general fund cash flow projection, dated September 5, 2012, indicates that the district will draw another $1.5 million in fiscal year 2012-13, and staff anticipate drawing the remaining funds in 2013-14 and/or using them for repayments due to audit findings.

The state loan has a repayment period of 20 years and includes an annual debt service payment, including principal and interest, of approximately $1.24 million beginning in 2010-11. The annual debt service payment is approximately 10% of the district's projected unrestricted general fund revenue in fiscal year 2012-13. Although there are no specific standards regarding the amount of unfunded debt that is considered prudent for California school districts, debt service payments in the range of one to two percent of the unrestricted general fund revenues

are typically considered reasonable. Any long-term debt that the district must pay out of its unrestricted general fund is considered unfunded because it requires the use of resources typically dedicated to the current costs of educating students, such as salaries, supplies and services. Although many districts are able to fund some long-term debt out of their unrestricted general fund, a debt service payment of 10% of the unrestricted general fund revenue will be extremely difficult to sustain.

Unlike other state loans, the district was not held harmless from the costs of financing and increased interest rates associated with the bond sale; therefore, it bears an increased burden in the financing and repayment of the loan. As reported by the California Department of Education (CDE), the district's loan carries an interest rate of 5.44%, which is significantly higher than that of some other districts receiving state intervention. For reference, the CDE lists the terms of previous state loans on its website at http://www.cde.ca.gov/fg/fi/ir/stateemergloans.asp.

The district has the option to defease (that is, secure with other collateral) or prepay the bonds, but to do so the district would need to have enough cash to set aside in an escrow account the amount required to pay debt service on the bonds as well as funds to cover additional costs for legal counsel, trustee and financial advisor services, and possibly a fee from I-Bank related to setting up the escrow account. Although the district's loan carries no prepayment penalty per se, the district would be responsible for the costs of defeasance in order to prepay, which could be significant and may diminish the benefit of interest savings sought through prepayment. The ongoing costs to the district's general fund to cover the annual debt service payment and the high costs associated with prepayment constrain the district's fiscal recovery efforts. The district will need a solution such as a restructuring of the loan, or an amendment to Senate Bill (SB) 130.

Budget and Multiyear Financial Projections

Fiscal years 2008-09 through 2012-13 have been unprecedented budget years for California's local educational agencies (LEAs). The state's fiscal crisis has resulted in deep budget cuts to LEAs, including a revenue limit deficit of 22.272%, significant reductions in categorical program funding, and increased cash deferrals. Passage of Proposition 30 in November 2012 helped stabilize education funding for the 2012-13 fiscal year by increasing state tax revenues, thereby avoiding mid-year budget reductions. Based on current state and federal forecasts for a slow economic recovery, the district will need to continue to make and implement difficult budget decisions to regain its fiscal solvency.

During previous review periods, the district settled negotiations with its certificated and classified employee bargaining units for July 1, 2010 through June 30, 2013. Although the negotiated agreements provided a significant annual budget savings of approximately $2.27 million and show progress toward fiscal recovery, the district's 2012-13 unrestricted general fund budget and multiyear financial projections (MYFPs) include deficit spending in fiscal years 2012-13, 2013-14 and 2014-15 and project a negative ending balance in 2014-15. Therefore, the district still has a significant amount of work to do to ensure that its budget is structurally balanced.

Business Department

The district has continued to make progress in providing accurate, timely budget information to the county office of education. County office staff also indicated that the district has continued to submit payroll reports on time and that CalSTRS and CalPERS reporting errors have decreased. However, the district's business department consists of only 2.6 full-time equivalent (FTE)

positions: the chief business official, a fiscal services manager and a part-time business office technician who took the position in July 2012. Although previous district organizational charts included three full-time business department positions, because of budget constraints, the district made the technician position part time.

The department has experienced significant turnover, has been restructured three times in the last three years, and is conducting an executive search to replace the interim chief business official (CBO), who returned to the district in September 2012 following the resignation of a permanent CBO who served in the position for approximately five months. It is imperative that the district find a qualified individual to fill the CBO position and consider increasing the business office technician position to full time so that it can maintain progress made thus far, complete essential financial and cash flow analyses, implement and improve necessary internal controls, provide proper supervision of staff, and provide governing board members and site and department staff with training regarding the budget and fiscal processes and procedures.

Internal Control Environment

The district has made significant progress in updating its board policies, and the state administrator has begun to provide draft board policies and administrative regulations to applicable administrators and managers for review and input prior to placing the documents on the board agenda. A code of ethics has been adopted; however, the district has not maintained its efforts to educate staff on this subject. The code of ethics policy was not distributed to all employees, and no ethics training was provided during this review period. The district has converted its internal fraud hotline to the WeTip hotline; however, many employees are unsure of what is to be reported through the hotline. Additional information needs to be provided to employees regarding the use of WeTip, and written procedures regarding the district's processes for acting on information reported through the hotline should be established.

The interim CBO is the only district employee who has the training and experience needed to process payroll. The interim CBO is responsible for processing payroll, signing the preliminary payroll list, and has access to the pay warrants once they are received from the county office. This process does not provide for proper internal controls, and the district should immediately train and assign another employee to process payroll so that duties may be properly separated.

During this review period, purchase orders and vendor and payroll warrant registers have not been included on the board agenda for approval or ratification. The district needs to ensure that purchase orders and contracts are presented for approval and that warrants, in summary form, are included for ratification on each regular board meeting agenda.

Communication and Organizational Capacity

Site and department staff members indicate that a good working relationship has been established with the business department and that the department provides information in a timely manner. However, site and department staff who perform business-related duties need more training regarding business procedures and budget functions. In addition, annual audit findings should be shared with applicable staff members as soon as the audit is received to help ensure that procedures are corrected and staff are held accountable for following them.

The cabinet meets twice per month and includes the state administrator, CBO, director of educational services, human resources administrator, department managers and the executive assistant to the state administrator. In addition, administrative council meetings are conducted

every two weeks, and members include the state administrator, CBO, director of educational services, human resources administrator, executive assistant, special education director, site principals and assistant principals.

During this review period, an executive cabinet was formed. Members include the state administrator, CBO, director of educational services, human resources administrator and the executive assistant to the state administrator. The executive cabinet meets weekly and provides an opportunity for participants to discuss district issues and to ensure that decisions the state administrator has made have been communicated to staff members responsible for their implementation.

Student Attendance

Because average daily attendance generates the majority of the district's general fund revenue, it is crucial that the district provide adequate training and guidance for employees who are responsible for attendance reporting. Mandatory attendance training for school site personnel was provided in October 2012. To be most effective, mandatory training should be conducted prior to the start of each school year and should give staff the opportunity to clarify procedures and ensure that any new laws and regulations are communicated in a timely manner. Additional training should also be provided when requested.

The 2010-11 annual audit report included a finding which indicated that all of the 2010-11 continuation school attendance would be disallowed because one teacher signed daily attendance reports using false names and fictional characters. The estimated funding loss resulting from this finding is $500,000. The district has filed an audit appeal requesting that the funding loss be reduced to the classroom attendance of the teacher involved; however, the district has not yet received the results of the audit appeal. California Code of Regulations (CCR), Title 5, Section 401 requires teachers to take attendance; therefore, the district should hold accountable any teacher who fails in his or her duty to complete an accurate record of attendance. All teachers should be reminded of the severe consequences of falsifying attendance reports, and site administrators should review signed attendance reports to verify the teachers' signatures.

As of June 30, 2012, the district closed its independent study charter school and moved the independent study program under the control of the interim director of educational services. Previous recommendations to provide mandatory training in the area of independent study have not been implemented and leave the district at risk for incorrect attendance reporting. The district has implemented online student attendance reporting for the independent study program; however, some teachers continue to turn in paper documents that must be entered into the Aeries student information system manually. The district should require all teachers to enter attendance data using the Aeries online system to provide efficiency and reduce the chance of error.

Associated Student Body

During this review period the district provided associated student body (ASB) training and a FCMAT ASB Manual to staff responsible for ASB tasks. The district also transitioned to specialized accounting software and opened a separate ASB bank account for each comprehensive high school. This will begin to provide the framework for consistency among sites and the eventual shift of ASB accounting from the district to the school sites.

The district previously adopted Board Policy 3452, Student Activity Funds, which provides a description and overview of fundraising and the management of student funds. However, the

district has not yet developed administrative regulations and written procedures that support Board Policy 3452 and that clearly define the roles and responsibilities of personnel involved in managing ASB activities and accounting functions. These regulations and written procedures are necessary for proper internal controls.

Management Information Systems

The Monterey County Office of Education is converting districts in the county from the FMS financial software system to the Escape Technology, Inc. system for human resources and business functions. The Escape system will integrate all the financial components that include payroll, position control, budget, budget development, purchasing and general ledger. The effective date for implementation is July 1, 2013. District staff have expressed concern regarding the district's readiness to make the conversion by that date, and having a limited number of personnel in the district office makes it difficult for staff members to commute to the county office for weekly training as well as keep up with their assigned duties. The county office and district administrators should ensure that all applicable district staff members have received proper training prior to converting to Escape and that adequate support is available once the conversion has occurred.

The district has developed a comprehensive technology policies and procedures manual during this review period that is designed to complement and support the technology plan. Technology is used throughout the district and is vital for student data reporting, student assessments, student attendance, notifications to parents and central office applications. All departments and school sites depend heavily on computers and network services to do their jobs. The district's technology plan indicates that a majority of the district's computers are more than four years old. However, the district lacks a plan and an identified funding source to replace aging technology infrastructure and equipment. The district should make it a priority to develop such a plan.

Food Services

During this review period, the district completed its second year of operating its own food service program and reduced the contribution from the unrestricted general fund from $346,380 in fiscal year 2010-11 to $145,989 in 2011-12. However, the 2012-13 cafeteria fund budget does not reflect the projected program income and expenditures in some categories and was forced to balance showing no contribution from the unrestricted general fund. The district needs to revise the cafeteria fund budget to properly show projected revenue, expenditures and general fund contributions. To further reduce general fund contributions, the district needs to implement additional measures including working with its contracted vendor to improve menu selections and increase student participation; providing more training to the food and nutritional services manager to properly analyze the financial aspects of the food service program and increase efficiency; and prohibiting fund-raising activities that do not comply with federal and state regulations for the National School Lunch and School Breakfast programs.

Facilities Management

The facilities management section of the comprehensive report assessed the district based on 27 FCMAT standards in nine categories. The facilities standards ratings ranged from one to eight on a scale of zero to 10. The average rating for facilities standards is 5.63, with 23 standards partially implemented with a score of one through seven, and four standards fully implemented

with score of eight through 10. The January 2010 average scaled score for the standards was 1.04, the March 2011 scaled score was 2.15, and the March 2012 scaled score was 4.56. The rating improved for 15 of the standards and declined for one standard. The increase in the ratings indicates continued improvement and implementation of the standards.

To assess these standards, FCMAT inspected all school and district facilities and grounds, interviewed district and site staff, and reviewed district documents and board policies.

Leadership and staffing

Since the last review, a new state administrator was assigned to oversee the district. The new administrator has maintained the course of facilities improvement established by the previous administrator while he focused on other district priorities. The district's financial limitations continue to make it necessary to postpone maintenance and facilities projects, lengthen the replacement cycle of equipment, and restrain staffing levels.

The district continues to employ one full-time director of maintenance, operations, transportation, and facilities (MOTF), who is responsible for management and oversight of all facilities, and the home-to-school transportation program, including bus repair and maintenance. This position and its scope of responsibility remain consistent with high school districts of similar size and structure. The director is responsible for developing and implementing all of the district's regulatory and legal compliance programs as they relate to facilities and staff and student safety. Most of these programs continue to improve with each consecutive assessment.

Following recommendations made in a separate review of the MOTF department, the district has reorganized the job duties and job descriptions of custodians and groundskeepers, resulting in increased efficiencies and additional staff hours at each of the sites. Prior to the last review, the district also increased MOTF staffing by adding a technician position to assist the director. During the current review period this MOTF technician position's work in the MOTF department was reduced by approximately 60% and this portion of the time was shifted to duties in the district's business office. Although some momentum was lost, because the technician position had significantly improved the efficiency and systematization of the department, several areas of the facilities standards have been implemented and continue to show progress.

School Safety

The district has not updated its emergency and disaster preparedness plans since 2007, has not developed a comprehensive districtwide safety plan, and has not fully implemented its Injury and Illness Prevention Plan (IIPP). The district is providing some regular safety training in accord with the IIPP, and some regular safety inspection is occurring as recommended in the plan. The district has also implemented online safety training through the human resources department, as well as some safety training provided by outside vendors and consultants. However, no coordinated or comprehensive plan for employee safety training has been developed.

The district has reorganized the supervision of the custodial, maintenance, and groundskeeping personnel, some of which is now the responsibility of school principals, and some new work schedules have been implemented. The cleanliness of the school campuses has improved considerably since the last review. In addition, the district has continued to update and maintain the material safety data sheet (MSDS) binders and provide regular training regarding their use.

Some areas of safety previously noted as an urgent concern have been addressed. The lighting at both high school campuses has improved significantly: The exterior parking lot lighting at Greenfield High School has been repaired, and the district plans to complete additional lighting improvements at King City High School. The district is maintaining its key control procedures implemented prior to the last review, but there is still some difficultly exercising authority and retrieving keys from staff members.

Facility Planning

The facilities are not overcrowded, and capacity exists for additional students. The district's primary issue with its facilities remains its inability to properly maintain them. The location, general appearance and function of the district's campuses need to be conducive to learning. However, the district still has several nonconforming buildings that do not meet the requirements of the Field Act.

The district's facility advisory committee has met regularly since the last review, and the district is creating a foundation with the goal of raising funds for capital improvements. However, very little other progress has been made in the area of facility planning. The district still has not inventoried its buildings, identified which buildings are nonconforming, or obtained waivers for their continued use. There has been no update to the School Facilities Master Plan, which should be updated to include the completion of work on the King City High School modernization project. The district also has not developed a plan to ensure the equality and equity of all of its school facilities.

Facility Improvement, Modernization, and Construction

The district has completed its modernization project at King City High School and has received approval from the Office of Public School Construction (OPSC) to spend remaining funds. Despite the completion of the modernization project, the district's facilities remain in need of significant repairs, and some identified projects may be considered health and safety hazards.

The district's ability to address current and future health and safety concerns is severely limited by its difficult fiscal status and a prohibition of eligibility for financial hardship funding during the period of the state loan.

With the remaining OPSC funds, the district is planning additional modernization projects at King City High School, which will be managed by a professional construction management firm, with the director of MOTF as the primary liaison for the district. The director has increased his knowledge of OPSC and Division of the State Architect (DSA) processes.

The reduction in the MOTF technician's hours has reduced the time the director can be available to manage construction projects and resulted in a lack of improvement in the organization of the district's construction and maintenance records.

The architectural firm the district hired to help assess its relocatable buildings has not completed the project because records for many buildings have been difficult to locate. The district has not updated its five-year deferred maintenance plan since 2009-10 but has made expenditures from the deferred maintenance fund in the past year in accordance with the existing plan.

Facilities Maintenance and Operations

The district has placed some supervision of the custodial, maintenance and grounds workers under the school principals, who have authority to modify work schedules to fit the needs of their campuses. A concern with this approach is that the director of MOTF and the state administrator have discontinued regular site walks with the site administrators. These walks helped to identify facilities issues and provide support. However, FCMAT found dramatic improvement in overall school cleanliness and in the grounds at both schools. The April 2012 Facilities Inspection Tool (FIT) review mandated by the Williams Act rated the sites as in good repair with no items in need of emergency attention. Only the category of interior surfaces (floors, walls, ceilings and countertops) was given a rating of "fair." The deficiencies noted on the FIT have been corrected regularly.

Custodial standards have been successfully implemented, and the custodial inventory has been monitored and maintained adequately. The district has developed an inventory of its equipment, vehicles and facilities. However, the equipment inventory has not been updated in the past year as the district removed vehicles from service as part of a vehicle replacement plan. The equipment and asset inventory program should be updated regularly and should include a routine inspection, repair, maintenance and replacement plan.

The district has not developed a preventive maintenance plan. Maintenance projects are completed based on their urgency or whether they are a threat to student safety. As reported in the previous reviews, the district continues to use an automated work order system called Help Desk that tracks work requests and their status; however, the system is still not used to its full potential. The district still has no formal procedure to prioritize and assign work requests; to follow-up on the timeliness, quality, and satisfaction of completed work; and to monitor productivity. In addition, work standards for maintenance and grounds positions have not been developed to help identify acceptable facility and grounds conditions. This hinders the district's ability to be proactive and to hold staff accountable.

The purchasing processes established by the business office and used to procure MOTF supplies and equipment are being followed and the system is working well. The MOTF technician still monitors the MOTF department's purchasing processes, and the records are well organized.

Community Use

The facilities advisory committee has met regularly over the past year. The new state administrator is creating a foundation to help promote community involvement in school facilities improvements and community trust for the organization. The district's facilities are being used frequently by the public, and the condition of the campuses has improved. The district also communicates with the public through the FIT review but still has no written plan to promote community involvement in the schools.

Community Relations and Governance

1.1　Communications

Professional Standard

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

Sources and Documentation

1. Interview with state administrator

2. Interview with human resources administrator

3. Interview with board members

4. Interview with reporter from King City Rustler newspaper

5. Interview with president, Greenfield Rotary Club

6. Interview with president, King City Rotary Club

7. Board agenda and minutes

8. Newspaper articles

9. Press releases

10. Weekly updates from state administrator

Summary of Third Comprehensive Review, March 2012

The district had developed a comprehensive plan that contained the essential elements of successful communication strategies necessary for effective internal and external communication. The board and some staff were aware of the communication plan.

Summary of Fourth Comprehensive Review, March 2013

The district's written comprehensive plan for internal and external communication has been implemented. The plan is monitored, application is becoming systematic, and appropriate adjustments are made. The board, staff and community are aware of the plan.

Findings

1. There is a full comprehensive plan for internal and external communications, and it is fully implemented.

2. The district's name was changed last year from King City Joint Union High School District to South Monterey County Joint Union High School District. The purpose of the

name change was to be more geographically inclusive of Greenfield High School and the elementary feeder districts. The name change also serves to lessen any stigma associated with the district being in state receivership. Public hearings were held prior to the name change.

3. The state administrator meets with the local newspaper editor following each monthly board meeting and at other times as needed.

4. Updates from the state administrator appeared in the King City Rustler newspaper on January 4, 2012; February 22, 2012; and March 28, 2012 regarding the state loan and the FCMAT annual comprehensive reviews, including the components of the review and the rating process. There was also an update on the school calendar.

5. A binder of newspaper articles collected over the past year included articles on the recovery plan, board of education update, new board members, student test scores, community forums, students of the month, budget challenges, principal speeches, the Future Farmers of America (FFA) program, graduation, community donations, honoring volunteers, the appointment of a new state administrator; the state administrator's participation in Rotary, and many other topics.

6. The local newspaper editor expressed a desire for more contact with and information directly from the school sites. The newspaper would like to get more school-level information. District-level contacts and information have improved and are satisfactory.

7. Board polices 1100 through 1700, regarding communication with the public, were revised and approved in 2010.

8. The news media receives board meeting agendas and board packets, and agendas and minutes are posted on the district's website, which has been recently updated.

9. The state administrator and representatives of the local California State Employees' Association (CSEA) chapter meet monthly, and the working relationship with the CSEA has improved. The CSEA acknowledges and appreciates the monthly meetings, and has asked for more meetings.

10. The working relationship with the South Monterey County Joint Union High School District (SMCJUHSD) teachers' association leadership has improved significantly.

11. The negotiation team leader for the certificated bargaining group communicates with and works satisfactorily with the state administrator. The state administrator indicates that the teachers' association president attends meetings and fully participates in a positive manner. In addition, the teachers' association sometimes requests or initiates meetings with the administration.

12. The district distributed a Parent Satisfaction Survey to the community. Survey results are in but have not been tabulated or analyzed. The purpose of the survey is to determine what the community wants and how they want to receive information. The survey also

gives the community the opportunity to provide feedback regarding communication, governance, curriculum and school climate. The results, analysis and application of results will be a significant subject for review in FCMAT's March 2014 comprehensive review.

13. The state administrator is pursuing a goals-related path. The staff is more positive about the district's direction, and relationships and the work environment have improved; however, the state administrator is rightly concerned that some staff and community members may be losing sight of the district's continuing financial difficulties. The state administrator has to constantly remind people that improving relationships and the work environment does not necessarily affect the district's fiscal problems.

Recommendations for Recovery

The district should:

1. Continue implementation and monitoring of the comprehensive plan for internal and external communications, including a media relations component.

2. As the communication plan is implemented and monitored, make changes as necessary. Over time the plan should be improved and sustained.

3. Continue to evaluate its communications efforts through surveys, focus groups or other methods that encourage participants to give their opinions freely.

4. Discuss the results of the Parent Satisfaction Survey in administrative meetings and at school sites. In addition, present the results at a public board meeting and distribute them to the community and the press.

5. Continue to post board agendas and minutes on its website regularly, and distribute board agendas and packets to news media.

6. Continue to schedule regular meetings with local media representatives and staff to apprise the community of the district's progress toward recovery and to seek community comment on initiatives. Send press releases to the newspaper regularly regarding student events and programs, and include the newspaper in the distribution of information sent to all parents.

7. Continue to schedule regular meetings with the classified and certificated employee associations' representatives to discuss issues of mutual concern.

8. Ensure that school sites send the newspaper information about school programs and events daily, and let the newspaper reporter decide which information is significant for publication. In addition, schools should automatically send the newspaper any information that is provided to all parents, including information provided by telephone.

Standard Partially Implemented
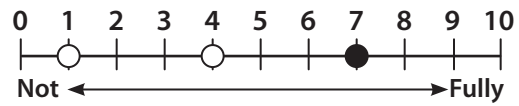
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 7

Implementation Scale:

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   Not ←————————————————→ Fully
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1.2   Communications

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Board policies and procedures regarding communication

6. Sample minutes of staff meetings at school and district level

7. Newsletters

8. Information related to goals and achievement

Summary of Third Comprehensive Review, March 2012

The state administrator had provided ongoing communication with staff as well as with the community through both written media and radio. There was evidence the district was communicating with staff, but more effort needed to be made to establish and encourage two-way communication.

Summary of Fourth Comprehensive Review, March 2013

The state administrator has significantly improved communication with staff. Communication is systematic and sustained.

Findings

1. An informal letter updating employees on the state of the district is included with employees' monthly paychecks.

2. The state administrator distributed memos updating staff on the state loan and takeover of the district.

3. The state administrator has established a blog where staff and community can get up-to-date information and respond promptly. The blog has largely replaced the monthly newsletter.

4. The state administrator conducts biweekly administrative council meetings, for which administrators have the opportunity to submit agenda items in advance and at which all administrators have the opportunity to communicate concerns, questions and suggestions.

5. Regular, systematic communication indicating proactive contact with staff and the public is provided via the state administrator's blog and through other updates and memos from the state administrator. Principals also provide updates and letters to parents.

6. There is evidence of systematic communication at school sites regarding monthly staff meetings, state testing and reporting (STAR) meetings, site council meetings, English learner advisory committee (ELAC) meetings, department meetings, and other key meetings and events. The ELAC committee is a legal requirement for English learner programs that receive categorical funds.

7. High school websites allow parents to access their child's grades, attendance and discipline records online. Parents who do not have a computer or internet access can also receive this information by mail.

8. The Alert Now telephone message system informs parents when their child is tardy or absent from a class or school.

9. There are advisory committee meetings at the district level to encourage communication and involvement of staff and the community in understanding the district's programs, operation and status. There is a budget committee, a facilities committee and a technology committee, and a diversity committee is being established. The district has a chart that shows the composition, membership and contact information for each committee. ELAC and curriculum committees have recently been added to the list of committees.

10. The district's curriculum committee meets every other month and deals primarily with categorical programs and budgets.

11. Under the direction of the previous state administrator, collective bargaining agreements were reached with the classified and certificated employee bargaining units. These agreements include significant reductions in salaries and benefits, which are necessary to re-establish the district's fiscal solvency over the long term. Because of the state's fiscal problems and the significant cuts to education funding, it is probable that the district will need to make further budget reductions in the near future.

Recommendations for Recovery

The district should:

1. Continue to sustain systems and procedures to ensure ongoing two-way communication between the district office and all staff to ensure a timely flow of information and direction.

2. Continue to encourage classified and certificated staff to provide feedback to the district office.

3. Continue regular meetings of the previously established and new advisory committees to provide comment to district administrators and the board regarding priorities and issues. In addition, continue to hold productive meetings with employee organization representatives.
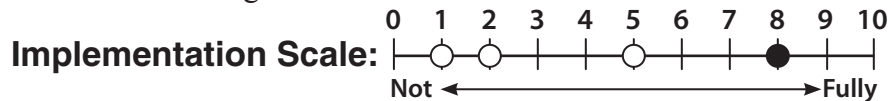
Standard Fully Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 8

Implementation Scale:

1.4　Communications

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Interview with president, King City Rotary Club

6. Board agendas and minutes

7. Newspaper articles

8. Press releases

9. Weekly updates from the state administrator

Summary of Third Comprehensive Review, March 2012

Board members were making good progress in understanding their roles and responsibilities as board members and with regard to communicating with the public. California School Boards Association (CSBA) training and the leadership provided by the state administrator had been beneficial.

Summary of Fourth Comprehensive Review, March 2013

Board members understand their roles and responsibilities in communicating with the public. Board members have received Masters of Governance training from the California School Boards Association (CSBA). The state administrator and board members speak with one voice, and most important matters are properly referred to the state administrator.

Findings

1. Board Policy 1100, adopted September 8, 2010, spells out roles, responsibilities and methods of communication with the public regarding the district's programs and decisions.

2. The state administrator makes public statements on behalf of the district.

3. The state administrator provides status reports to update the community regarding the district's state loan and receivership issues.

4. There is no evidence of any improper communication by any current board member.

5. There are two new board members; one has completed all of the CSBA training and the other still needs to complete part of the training.

6. There has been improvement in staff and board communication and in media coverage. There has been a significant effort to use media coverage of board meetings and school programs more effectively. The state administrator meets with the press following each monthly board meeting. In addition, the state administrator is a Rotary member and speaks at both the Greenfield and King City Rotary meetings.

7. School sites communicate on a limited basis with the local newspaper and radio station. The local newspaper reporter indicates that some school information is not received in a timely manner, particularly from school sites (e.g., information about public meetings and new programs).

8. During the past year, the board has been provided with Masters of Governance training from CSBA, which includes media relations training.

Recommendations for Recovery

The district should:

1. Fully implement updated board policies, particularly 1100 and 1112 regarding community relations, by continuing to follow its written communication plan; implementing its goals, guidelines and procedures; and distributing them to staff.

2. Encourage board members to continue to refrain from speaking publicly about decisions or programs without the knowledge and support of the full board and the state administrator.

3. Provide ongoing media relations training for board members and district administrators, including continuing training in the CSBA Masters of Governance program.

4. Schedule regular meetings of the media and authorized district spokespersons to improve communication, increase understanding regarding which individuals are authorized to speak on the district's behalf, gain more positive and accurate press coverage, and better inform the public of the district's policies and activities.

5. Continue to provide the media with written press releases regularly. Establish frequent contact between the state administrator and the media between board meetings as well as immediately following board meetings.

Standard Partially Implemented
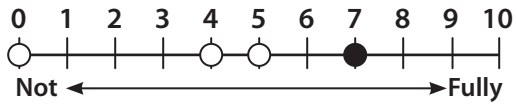
February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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       Not ◄──────────────► Fully
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2.4   Parent/Community Relations

Legal Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Interview with president, King City Rotary Club

6. District parent-student handbook 2012-2013

7. Cal Grant GPA information release form

8. Greenfield High School principal's back-to-school night opener

9. Registration for Parent Portal account

10. School site council agendas

11. Notification of annual second language assessment

12. Alert Now record of usage

13. Letter to parents from the state administrator

14. School site plans (Single Plan for Student Achievement)

Summary of Third Comprehensive Review, March 2012

The district continued to make progress in communicating with parents through the leadership of school site administrators. The draft communication plan should have been adopted and disseminated to support effective and systematic communication in the district.

Summary of Fourth Comprehensive Review, March 2013

Communication with parents has improved. Parents and community members are encouraged to be involved in school activities and are kept informed in a variety of ways.

Findings

1. A communication plan has been developed and is systematically used. The plan needs to be sustained and adaptable to change so that, in accordance with the mission statement, multiple methods of communication can be used to ensure that parents and community members are regularly informed and involved.

2. A welcome letter to parents from the Greenfield High School principal explains schedules and graduation requirement changes. A parent e-mail information form was also sent to parents.

3. The principals communicate with parents regarding what is happening at the schools, and they encourage parent involvement through monthly newsletters, back-to-school night, recruitment of school site council members, and ELAC membership.

4. Quarterly meetings of ELAC and district site councils are scheduled.

5. Principals hold public forums and school site council meetings to discuss school issues.

6. The state administrator and the principals speak at Rotary club and chamber of commerce meetings.

7. There is media coverage of meetings with parents regarding the status of the district, but the newspaper reporter indicates that more contact is needed, particularly from school sites.

8. Many parents do not know how to get involved in school activities, do not want to be involved, or are unable to be involved because of their work hours.

9. There is limited involvement of parents in school activities such as school site councils and ELAC. However, there is increasing evidence of a proactive, systematic plan to increase parent involvement.

10. There is some media coverage of school site council and advisory committee meetings, but the local press desires more information regarding these committees.

11. The Alert Now system provides telephone messages to parents when their child is tardy or absent from a class or school. This system must be explained annually to parents. It may benefit the district to issue a press release that explains that the intent of the system is to reduce tardiness and absences, and to explain the connection between an increase in average daily attendance, increased opportunity for instruction and increased state funding.

12. The district's website has a parent portal section that is linked to each school's website and includes a password-protected system for parents to check their children's academic progress online.

13. The district has a blog online from which staff and community can get current information and to which they can respond immediately.

14. The district's website has been updated and is significantly improved. Parents can access their student's grades, attendance and discipline records as well as announcements regarding school meetings and events.

15. School site plans follow district goals.

16. Principals are holding public forums with parents and community members.

17. It is not clear which administrator is the designated public spokesperson for the district.

Recommendations for Recovery

The district should:

1. Continue encouraging principals and administrators to attend community functions to increase visibility.

2. Continue the open forums that principals conduct with parents and interested community members. Send advance notice of these forums to the media so that they have the option to attend.

3. Ensure that principals regularly send the local media press releases regarding school events.

4. Issue a press release explaining the Alert Now system and the benefits of increased student attendance.

5. Consider designating the state administrator as the district's spokesperson authorized to meet with the media regularly to discuss school events and thus help ensure more media coverage of school programs.

6. Continue to improve and update the district's website with information that includes ways for parents to become more involved in school activities and encourages them to do so.

7. Invite the media to the administration's open meetings with parents at which administrators will be discussing items of interest to the public, such as the district's progress toward recovery. The local newspaper reporter should be invited to school site council meetings and other advisory committee meetings because all these meetings are public.

Standard Partially Implemented
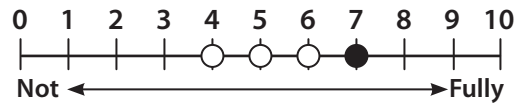
February 2010 Initial Rating: 4

March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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2.8   Parent/Community Relations

Professional Standard

Board members are actively involved in building community relations.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Interview with president, King City Rotary Club

6. Board Policy 1100, Communication with the Public

Summary of Third Comprehensive Review, March 2012

The board had adopted policies regarding board/community relations and still regularly needed specific direction from the state administrator regarding how to fulfill their role in this area by supporting school activities and being visible in the community. The board members were making progress in this area and had increased their understanding of how they could contribute to effective community relations.

Summary of Fourth Comprehensive Review, March 2013

The board has adopted policies regarding community relations and is regularly involved in board meetings and other community activities. Board members sometimes speak at Rotary meetings and other community meetings. Board members regularly attend school and community events. The board members have received CSBA training in community relations.

Findings

1. Board policies concerning community relations have been updated. Policy updates and revision have become a routine part of board meetings.

2. Because of CSBA training and leadership from the state administrator, board members understand their roles and responsibilities with regard to community relations.

3. Board members attend school functions and visit classrooms. School site administrators appreciate their visibility on campus. Some board members are involved with athletics, FFA and booster clubs, and some speak at Rotary meetings and attend city and community events.

4. The state administrator wants all board members to visit every classroom annually. Visibility of board members at school sites could build credibility and trust between the board and staff and between the board and the community. It would be beneficial for board members to annually discuss and establish a schedule for visiting school sites and classrooms.

5. The state administrator meets with city administrators, the chamber of commerce, Rotary club and other civic groups. These activities are beneficial, and would be further helped by the board president's participation to increase the board's visibility in community affairs.

6. The board makes a concerted and systematic effort to improve community relations.

7. The district has board policies concerning community relations but no formal plan for how board members should be involved in building community relations.

8. Board members have received the Masters of Governance training from the CSBA as well as additional training from a CSBA consultant.

Recommendations for Recovery

The district should:

1. Continue to ensure that the board conducts an annual systematic review of its board policies, including newly reviewed and updated policies, to determine if further revision is needed.

2. Provide board members with ongoing training in developing a formal community relations strategy and in building community relations.

3. Continue to have the state administrator meet with city administrators and civic groups, and encourage the board president to do the same.

4. Ensure that the board develops a formal communication plan and aligns it with the CSBA's series 1000 policies regarding community relations. The review should include policies 1220, 1112 and 1000, which provide guidance in communicating with and involving the community as a partner in school success.

5. Ensure that the board, in conjunction with the state administrator, develops a formal, written calendar that includes a schedule for each board member to attend some school functions so that school events are well attended by board members. Rotate the schedule periodically so that over time every board member attends most of the important school functions, and so that board members visit all classrooms annually.

6. Continue to encourage the board to develop a plan to work collaboratively with local governments and agencies as well as school organizations. Make this element part of the communication plan.
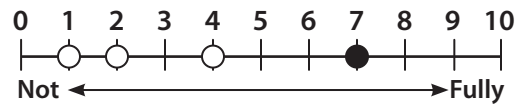
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 7

Implementation Scale:

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3.1 Community Collaboratives, LEA Advisory Committees, School Site Councils

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, 64001)

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board Policy 4020, Goals, Objectives and Comprehensive Plans for School Site Plans and School Site Councils

5. Administrative Regulation (Single Plan for School Achievement)

6. 2012-2013 Consolidated Application

7. District administrative council meeting minutes March 6, 2012 and September 4, 2012

8. Curriculum council guidelines for membership

9. Flyers on crime prevention, bullying, use of computers and cell phones, child pornography, and other topics

10. 2012-2013 bell schedule

11. Professional Learning Communities documents

12. State Testing and Reporting (STAR) results and trends

13. Volunteer coach checklists

14. Greenfield High School Site Council Roberts Rules of Order

15. School site council minutes and bylaws

16. Single plans for student achievement

Summary of Third Comprehensive Review, March 2012

School site councils were functional and had a meaningful purpose. Continued efforts to discuss student achievement were needed. The district had a formal but limited budget for school site councils, and the chief business official (CBO) had provided the councils with categorical program budgets for fiscal year 2011-12. The CBO needed to attend one council meeting per year to explain budget monitoring.

Summary of Fourth Comprehensive Review, March 2013

Policies and bylaws exist for the establishment and operation of school site councils. The school site councils are intimately involved in the development of a Single Plan for Student Achievement and in the development of the Consolidated Application. The site councils deal with both program and budget issues.

Findings

1. The district has policies and procedures for the establishment of school site councils, and their membership is organized according to law.

2. The school site councils have meeting agendas and minutes.

3. School site council members are genuinely involved in developing single plans for student achievement, and there is such a plan at each school site.

4. Parents acknowledge that test scores need improvement and that the district is still in Program Improvement status. Parents want the district to institute higher expectations for students.

5. Although funding is limited, the chief business official provided school site councils with budgets for the categorical programs for fiscal year 2011-12.

6. School site councils have been formed and meeting dates have been set for the 2012-13 school year.

7. There was substantial carryover of categorical funds from 2009-10 to 2010-11, including $116,000 in Title I categorical funds and $313,000 in Economic Impact Aid (EIA) categorical funds, which were intentionally carried over to purchase technology and software for the Read 180 program for all students who are not successful in English. This program is offered to eligible students at both comprehensive high schools and the continuation school. The schools report that the new Read 180 program is having a positive effect on learning.

8. The director of curriculum and assistant superintendent positions have been eliminated, which means that oversight of the school site councils is the responsibility of the interim director of educational services.

9. Single plans for student achievement have been turned in, but the state administrator indicates they need some adjustments. The plans address goals, but the state administrator indicates that timelines are needed for those goals.

Recommendations for Recovery

The district should:

1. Continue to ensure that school site councils follow the law regarding their organization, membership, agendas and meeting minutes.

2. Continue to ensure that school site councils address student performance expectations.

3. Continue to give clear direction to the school site councils regarding how much money is available and the legal guidelines and requirements for how that money is to be spent.

4. Continue to provide the school site councils with best estimates of budget numbers based on the previous year's funding. Adjust the budgets at the first interim reporting period and as the year progresses and more budget information becomes available from the state.

5. Ensure that the single plans for student achievement address timelines and goals for the 2012-13 school year.

Standard Partially Implemented

February 2010 Initial Rating: 2
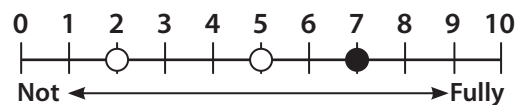
March 2011 Rating: 5

March 2012 Rating: 7

March 2013 Rating: 7

Implementation Scale:

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     0   1   2   3   4   5   6   7   8   9   10
     ├───┼───○───┼───┼───○───┼───●───┼───┼───┤
       Not ◄─────────────────────► Fully
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3.4 Community Collaborative, LEA Advisory Committees, School Site Councils

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Interview with president, King City Rotary Club

6. Lists of advisory committees and councils

7. Samples of committee and council meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

The board and state administrator had developed school site councils at each site and membership was current. The district had established district advisory committees for budget, facilities, technology and diversity. However, the curriculum committee was informal, ad hoc, and met as needed. Most curriculum issues were handled at the department level in department meetings.

Summary of Fourth Comprehensive Review, March 2013

The budget, facilities, technology and diversity committees continue to exist. In addition, ELAC committees have been added this year at each school site, and there is also a district ELAC committee. A new curriculum advisory committee deals with categorical programs and budgets. There is an effort to ensure that the membership of these committees reflects the diversity of the student population and the community.

Findings

1. The district has formed school site councils, and membership has been updated. The site councils are functional and operating as they should.

2. The district has established district advisory committees for budget, facilities, technology, diversity, ELAC and curriculum that meet on a regular schedule and maintain agendas and meeting minutes.

3. More individuals from the community are needed to serve on the various committees.

4. The facilities committee is a positive addition to the district. In the past the facilities committee has been involved in planning projects that can be paid for with money left over from a bond passed in the 1990s. This money, plus a small grant, has made possible roof repair and replacement as well as remodeling of the locker rooms at King City High School. As a result of these and other efforts, the appearance of King City High School is considerably improved.

Recommendations for Recovery

The district should:

1. Continue its use of broad-based committees that reflect the district's full cultural and ethnic diversity to advise the district on critical issues, and ensure that parents and staff are involved in these committees during the recovery process.

2. Continue to ensure that any committee formed develops and maintains a membership list, a description of members' roles and duties, and meeting agendas and minutes.

3. Continue to involve the budget committee, which includes staff and parents, in providing input regarding budget development and determining budget priorities, consistent with the requirements and guidelines established by the state administrator. This committee should also assist the administration as requested in presenting the budget development process to the public.

4. Continue to involve the facilities committee, which includes staff, parents and students, in advising the district on construction or remodeling plans, maintenance and facilities priorities, safety issues, cleanliness and sanitation, landscaping and grounds, handicap compliance, and appearance of schools.

5. Continue to involve the technology committee in helping the district evaluate and improve technology hardware, software and training programs.

6. Continue to establish other committees as directed by the state administrator.

7. Continue to ensure that all committee duties are consistent with meeting and implementing the recommendations and requirements of the recovery plan.

8. Consider a plan to recruit more individuals from the community to participate as members of various committees.

Standard Partially Implemented

February 2010 Initial Rating: 1
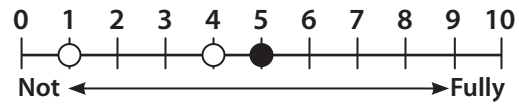
March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

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      0   1   2   3   4   5   6   7   8   9   10
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          Not ◄─────────────────► Fully
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3.6 Community Collaboratives, LEA Advisory Committees, School Site Councils

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with reporter from King City Rustler newspaper

5. Meeting minutes and materials showing that the district encourages and provides training to advisory committees regarding roles and responsibilities, administrative structure, and program processes and goals

Summary of Third Comprehensive Review, March 2012

There was evidence of training for members of school site councils and most advisory committees. The state administrator needed to implement a formal training program for school site council members after they are seated on the council.

Summary of Fourth Comprehensive Review, March 2013

The district has made an effort to establish training programs for advisory committees, but training programs have not been fully developed or implemented and are not systematic or sustainable.

Findings

1. There is written evidence of a modest training program for site councils and most advisory committees. Training includes some information about members' roles and responsibilities and the technical content of each committee area.

2. There is some limited training for curriculum committee members.

3. ELAC committee members receive limited training, but it is not formalized or systematic.

Recommendations for Recovery

The district should:

1. Implement a formal annual training program for all advisory committees to be conducted after members are selected. The training should include information regarding roles and responsibilities, legal requirements, budget overview and other relevant topics.

2. Ensure that ELAC members receive formal training regarding their roles and responsibilities as well as the legal requirements of ELAC programs.

3. Ensure that curriculum committee members receive training in their subject and their role on the committee, and that they understand the categorical program budgets and the district's goals with regard to curriculum.

4. Continue to provide and strengthen ongoing training in roles, responsibilities and relevant requirements for the members of all advisory committees.

5. Continue to provide and strengthen community collaboratives and future advisory committees with training in relevant subject matter and their respective roles and responsibilities.

Standard Partially Implemented
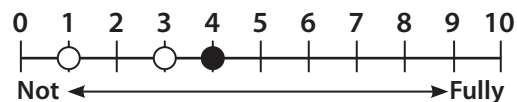
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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   0  1  2  3  4  5  6  7  8  9  10
   |--O--|--O--●--|--|--|--|--|--|
   Not ◄─────────────────► Fully
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4.5   Policy

Professional Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board meeting minutes from February 8, April 17, May 9, June 13, and June 27, 2012

Summary of Third Comprehensive Review, March 2012

Significant progress was being made in this area. Newly elected board members were following board policies and procedures and developing trust and respect with the state administrator. The state administrator needed to ensure that the board received further ongoing training regarding its members' roles and responsibilities.

Summary of Fourth Comprehensive Review, March 2013

The board supports and follows its own policies once they are adopted. The board is becoming more involved in policy development and is working well as a team and with the state administrator. There has been significant progress on this standard.

Findings

1. In the past, some board members did not follow the board's adopted policies regarding maintaining confidentiality in the area of collective bargaining and dealing with informal complaints. However, there has been considerable improvement in this area, and with the current board these behaviors are no longer present. The board follows its own policies.

2. Because of CSBA training and the leadership of the state administrator, board members have significantly improved their understanding of their roles and responsibilities.

3. The board has an improved understanding that a school board is an ongoing entity regardless of who is on the board and that policies adopted by previous boards remain in effect until the current board changes those policies in a legal public board meeting.

4. The board clearly understands that it has no authority at present to govern the district or to speak for the state administrator.

5. The board has received CSBA training in board ethics and other topics.

6. Four members of the current board have completed all the CSBA Masters of Governance training; one member has completed most of the training and will soon complete the rest. This is a solid first step in board training. CSBA materials and conferences, School Services of California conferences and other forums should provide continuing training opportunities.

7. Many board policies have been revised; others have yet to be revised. The state administrator places policy updates on board agendas on a continuing basis with the understanding that policy revision and update is an ongoing process.

8. The board is participating more in policy development as allowed and encouraged by the state administrator.

Recommendations for Recovery

The district should:

1. Provide the board with ongoing training regarding the roles and responsibilities of board members.

2. Ensure that the board continues to follow the policies set by both it and its predecessor boards until those policies are changed.

3. Encourage the board and staff to continue to comply with the state administrator's advice and decisions to help ensure that the district progresses toward regaining local control.

4. Continue to establish mechanisms to ensure accountability for adherence to the state administrator's policies and decisions so that board members do not deviate from the state administrator's direction.

Standard Partially Implemented

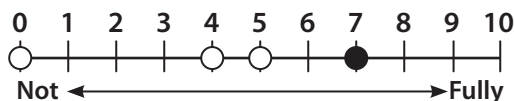February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
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          Not ◄───────────────► Fully
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5.2   Board Roles/Boardsmanship

Professional Standard

Board members receive necessary training to better fulfill their roles.

Sources and Documentation

1. Interview with the tate administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Registration documents showing board member participation in the July 23, 2012 School Services of California Annual School Finance and Management Conference

Summary of Third Comprehensive Review, March 2012

Board members had received ethics training and were receiving the complete CSBA Masters in Governance training. The board understood its unique role while the district is governed by a state administrator, but members were also learning the skills to function effectively as a board.

Summary of Fourth Comprehensive Review, March 2013

Four of the five board members have completed all modules of the CSBA Masters of Governance training; the remaining member has not completed all of the training but is eager to do so. All that remains is to schedule the training for the last member. The training should be scheduled as soon as reasonably possible.

Findings

1. Three board members have been on the board for varying lengths of time. Two board members are new: one of these members was elected and the other was appointed by the state administrator.

2. Board members have received ethics training and the complete CSBA Masters of Governance training. Four board members have completed all nine modules, and one board member will finish the training soon.

3. Board members are developing a better understanding of their role and responsibilities through the workshops they are attending.

4. Board members have a better understanding of the state administrator's role, and the board is aware that board members can ask questions and provide input regarding agenda items in discussions, but whether and to what degree board suggestions are included in decisions or acted upon is at the discretion of the state administrator.

Recommendations for Recovery

The district should:

1. Schedule the remaining CSBA Masters of Governance training for the fifth board member.

2. Ensure that board members consistently attend CSBA trainings, School Services workshops, and conferences to gain a better understanding of board protocols and fiscal issues. Interacting with board members from other districts should be encouraged to help board members gain a broader understanding of board issues, problems and solutions.

Standard Partially Implemented

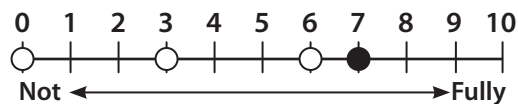February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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        0   1   2   3   4   5   6   7   8   9  10
        ○───┼───┼───○───┼───┼───○───●───┼───┼───
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5.3   Board Roles/Boardsmanship

Professional Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Interview with president, Greenfield Rotary Club

5. Interview with president, King City Rotary Club

6. Local Education Agency Program Improvement Plan

7. Vision/mission statement and goals

Summary of Third Comprehensive Review, March 2012

Some staff and board members were aware of the mission/vision statement and expressed pride that it reflects the district's educational purpose. The state administrator needed to continue to ensure that an annual review of the vision statement and goals involves the board, staff and community. Full and sustained implementation of this standard was still needed.

Summary of Fourth Comprehensive Review, March 2013

The district has a vision/mission statement with accompanying goals and is beginning to systematically use it and incorporate it into the Single Plan for Student Achievement.

Findings

1. The district has developed a vision statement and goals and reviews them annually. The vision statement and goals are displayed on the district's website and in the district boardroom.

2. The district developed a governance handbook to help guide board members in their roles.

3. A culture of learning is being established, and every board agenda contains items related to student achievement and student progress.

4. The last item on each board agenda is principals' comments. Principals use this time to discuss student progress, test scores and instructional programs.

5. The district is using its vision statement to provide a framework for goals and academic changes, including developing a culture of learning.

6. Under the direction of the state administrator, the board, staff and community are involved in developing and periodically reviewing the district's vision statement and goals.

7. The board is kept up to date on test scores and student progress, and participates in discussions about student programs and student achievement.

8. The district has a local educational agency (LEA) plan for the No Child Left Behind Act of 2001. This plan is updated annually and was last revised and adopted at the October 13, 2011 board meeting.

Recommendations for Recovery

The district should:

1. Continue to review its vision statement and goals annually, and refine them as needed.

2. Continue to ensure that the vision statement is based on the needs of students, staff and the community.

3. Ensure that annual review of the vision statement and goals involves the board, staff and the community, under the guidance of the state administrator.

4. Ensure that work objectives and implementation plans developed from the vision statement and goals are consistent with the recovery plan and identified needs.

5. As long-term strategies and goals are implemented, ensure that the board, staff and the community are involved in determining their effectiveness.

6. Update strategies, goals and action plans periodically as needed, based on ongoing evaluation and the results of the parent satisfaction survey.

7. Ensure that the state administrator continues to meet with the board, administrators, school staff and community groups regarding the district's mission and goals so that there is a common understanding of the district's direction.

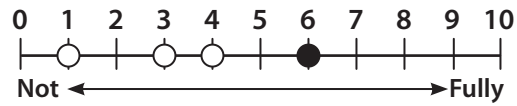## Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

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  ├──○──┼──○──○──┼──●──┼──┼──┤
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5.5   Board Roles/Boardsmanship

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Documents confirming board participation in CSBA Masters of Governance training (registrations, payment invoices, and chart showing board member participation in each of the nine training modules)

Summary of Third Comprehensive Review, March 2012

With changes in board members, the state administrator had the opportunity to be proactive in having new board members understand their roles and responsibilities. The board was supportive of the state administrator's decisions, and a spirit of mutual trust was beginning to be developed.

Summary of Fourth Comprehensive Review, March 2013

There is mutual respect, trust and a team approach and effort among all board members and between the board and the state administrator. Working relationships have improved significantly. Decisions are respected and supported by the board as a whole.

Findings

1. Board members in their limited advisory capacity have become increasingly understanding of the role and the decisions of the state administrator and of their own ability to ask questions and provide input.

2. Board members respect the role of the board in decisions that affect the district and understand that individual members have a role as part of the board during a legal public board meeting but not as individuals outside a board meeting.

3. Board members have increased respect for the confidentiality of collective bargaining matters and the need to refer problems to the state administrator.

4. The CSBA Masters of Governance training completed by all but one board member includes the following topics: foundations of effective governance; school finance; setting direction; human resources; collective bargaining; policy and judicial

review; community relations and advocacy; student learning and achievement; and governance integration.

Recommendations for Recovery

The district should:

1. Continue to ensure that the board cooperates with and honors the state administrator's decisions and directions.

2. Continue to ensure that individual board members demonstrate an understanding that they have a role as a board member only during a legal public board meeting.

3. Continue to ensure that training for board members emphasizes the fact that board members have a role only in a public board meeting.

4. Continue to ensure that individual board members refer to the district administration any individuals who come to them with issues or problems, rather than attempting to provide advice or resolve the issues themselves.

5. Continue to train board members to understand that they are viewed as board members while in public and outside of board meetings, and that when making a statement as a member of the public, a board member must not give the perception that he or she is speaking as a board member or for the board as a whole unless it is in a public board meeting.

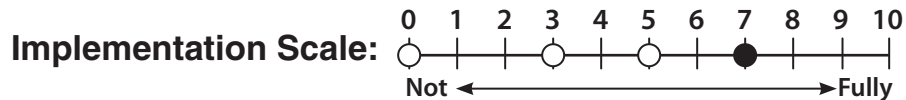## Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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        Not ◄───────────────► Fully
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5.6   Board Roles/Boardsmanship

Professional Standard

The board and administrative team maintain functional working relationships.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board minutes from June 13, 2012 meeting, in which a board member reminded fellow members that they are required to follow policies and rules and that there is a process for decision making

Summary of Third Comprehensive Review, March 2012

The board was starting to work effectively together and with the state administrator. The board acknowledged the state administrator as experienced and knowledgeable in training board members to understand their roles and responsibilities.

Summary of Fourth Comprehensive Review, March 2013

The board has made great strides in working together as a team and in working cooperatively with the state administrator and the district's administrative team. There is visible evidence of a supportive and positive work environment.

Findings

1. Board members have been doing a progressively better job of working through the chain of command by referring staff and community members' concerns to the state administrator.

2. Board members are increasingly aware that it is not appropriate for them as individuals to solve parent complaints, discuss confidential collective bargaining issues, or discuss confidential personnel issues; they recognize that these matters should be referred to the state administrator.

3. Board members are consistently improving their relationships with the state administrator and respect the decisions of the state administrator or the board majority in implementing districtwide policy.

4. Board members credit the state administrator for answering their questions and for giving them opportunities for input.

5. The board acknowledges the state administrator as experienced, knowledgeable and a good trainer to help board members understand their role and responsibilities, the law, and district programs.

Recommendations for Recovery

The district should:

1. Continue to provide board members with training regarding the board's legal role and responsibilities.

2. Continue to provide board members with training in differentiating between the board's role of broad policy guidance and the state administrator's or superintendent's role of administering the district's operations.

3. Continue to encourage board members to continue referring complaints, collective bargaining issues, personnel issues and other matters to the district's administration rather than providing advice or trying to resolve such issues on their own.
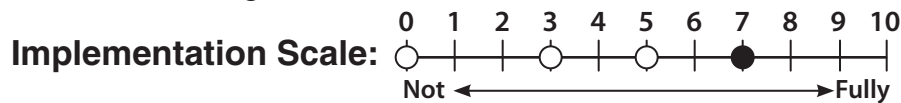
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

5.9 Board Roles/Boardsmanship

Professional Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Documentation of specific examples demonstrating board members' respect for the confidentiality of sensitive information shared by the state administrator

Summary of Third Comprehensive Review, March 2012

Board members had an improved understanding of the importance of maintaining professional and ethical confidentiality regarding certain district issues and operations, and their roles and responsibilities in this area. Board members discussed collective bargaining and personnel issues in closed sessions as appropriate.

Summary of Fourth Comprehensive Review, March 2013

Board members have significantly improved their understanding of the importance of the professional and ethical requirement to maintain the confidentiality of sensitive information. This improvement is systematic and sustained.

Findings

1. The board members have an improved understanding of their role and responsibilities regarding confidential collective bargaining and personnel issues.

2. Board members discuss collective bargaining and personnel issues within the confines of a closed session board meeting as appropriate.

3. School Services of California provided a workshop for the board regarding confidentiality and the board's role in the collective bargaining process.

4. The board has received and continues to receive training from CSBA regarding board ethics, confidentiality and other topics.

5. There is no evidence of current board members compromising the confidentiality of personnel or collective bargaining issues. The board has considerable respect for the confidentiality required for closed session items.

Recommendations for Recovery

The district should:

1. Continue to ensure that board members discuss collective bargaining, personnel and other confidential matters in closed session board meetings or confidentially with the state administrator.

2. Continue to encourage the board to consistently read the CSBA Journal and other CSBA materials to gain a perspective on how to be an effective school board member.

3. Continue to provide training for the board regarding their roles and responsibilities related to negotiations, personnel issues and other confidential matters.
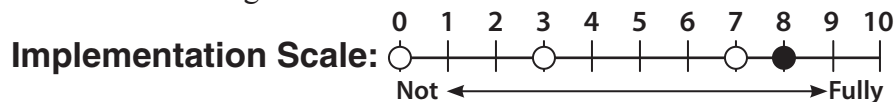
Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

5.10   Board Roles/Boardsmanship

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board minutes indicating that board members effectively develop policy and support the state administrator and the administrative staff in the implementation of board policies

Summary of Third Comprehensive Review, March 2012

The board was reviewing and revising board policies on an ongoing basis and was learning how their implementation provides consistency and effectiveness. The board provided input to the state administrator regarding policies, which assisted in developing mutual trust and respect.

Summary of Fourth Comprehensive Review, March 2013

The board, under the guidance of the state administrator, participates in developing and revising policies and in their implementation. The board is supportive of policy decisions once they are made.

Findings

1. The board participates in revising and updating board policies. The state administrator at times accepts board suggestions for changes or additions to board policies.

2. The board has demonstrated increasing support for the state administrator's decisions and accomplishments, such as in the negotiations process and in personnel decisions.

3. Board members acknowledge the state administrator's authority and role in collective bargaining, personnel matters, parent complaints, and policy implementation.

4. The board has participated in revising and updating many board policies and bylaws, but there are always more policies to review and update. Board members understand that policy updates and revisions will be on every board meeting agenda.

Recommendations for Recovery

The district should:

1. Continue to ensure that the board continues to support the state administrator in handling difficult issues such as negotiations and personnel matters, and that board members continue to refer any questions or concerns regarding these issues to the state administrator.

2. Continue to ensure that the board understands that support for the district's administration means that negotiations and personnel issues should not be discussed anywhere other than in a closed session of a public board meeting or with the state administrator in private. No individual board member should engage in discussion with staff, union members or public citizens regarding negotiations or personnel matters. In addition, no board member should discuss these issues with another individual board member except during a legal public board meeting.

Standard Partially Implemented

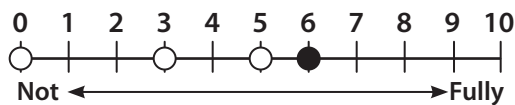February 2010 Initial Rating: 0

March 2011 rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

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        Not ←                    → Fully
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5.11   Board Roles/Boardsmanship

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

Sources and Documentation
1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. King City Rustler newspaper article titled, "Select Committee on School Financial Takeovers Hears Community Concerns"

Summary of Third Comprehensive Review, March 2012
Board members were encouraged to attend school functions that support all students, such as graduations and special events held at each school. Board agenda items regularly included student achievements.

Summary of Fourth Comprehensive Review, March 2013
Board members visit classrooms, attend school function and events, and participate in community activities. Board meeting agendas always include items related to student programs and student achievement.

Findings
1. Board members attend graduation and other high school programs and events but do not always follow a cooperatively developed calendar of scheduled attendance to ensure that board members are present at every major school activity and that they visit classrooms.

2. The board recognizes student achievement at board meetings.

3. The board is improving in its routine use of data: reviewing test scores, and comparing test scores with similar schools and districts and state norms to help evaluate the district's instructional programs to increase student achievement.

4. The board supports the state administrator in setting higher expectations for teachers and students to increase student achievement.

5. The board is improving in referring sensitive issues such as parent complaints, negotiations issues and personnel issues to the state administrator.

Recommendations for Recovery

The district should:

1. Continue to encourage board members to attend school events and programs to be visible and demonstrate support for schools, students and the community.

2. Continue to help board members cooperatively develop a calendar of attendance to ensure that they attend all major activities and visit classrooms with school administrators.

3. Continue to have the board recognize student and staff achievement at board meetings.

4. Ensure that the board continues to review and discuss student test data, comparing pupil achievement with similar schools and state norms to evaluate student performance and set educational goals.

5. Continue to have the board review student achievement data and address gaps in achievement by supporting the development of comprehensive programs for struggling students.

6. Continue to encourage the board's support of the state administrator in setting a policy for higher expectations of teachers and students to increase student achievement.

7. Continue to ensure that the state administrator, the board and principals perform ongoing evaluations of the effectiveness of student programs.

8. Continue to include items related to student performance and achievement on all board meeting agendas so that the board can become better informed about student progress and so that the community knows that student learning is the board's highest priority.
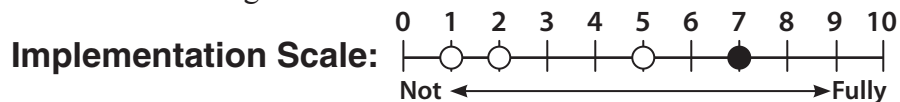
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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6.6   Board Meetings

Professional Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board agendas and minutes showing that board members are familiar with the agenda and support materials before the board meeting

Summary of Third Comprehensive Review, March 2012

Board members received board packets on time before board meetings so they had time to review and prepare for meetings. All board members stated that they had enough time and access to meet with the state administrator ahead of time to prepare for a board meeting if needed.

Summary of Fourth Comprehensive Review, March 2013

Board members receive board packets before board meetings, take their preparation seriously and are ready for board meetings. This preparation is systematic and sustained.

Findings

1. Board members consistently review the board agenda and support materials before board meetings.

2. Board members' preparation is consistent, systematic and sustained.

3. Board members more consistently contact the state administrator before a board meeting if they have questions or need clarification of board agenda items, which results in shorter and more efficient board meetings.

Recommendations for Recovery

Board members should:

1. Continue to consistently and thoroughly read and review the board agenda and support documents in advance of board meetings.

2. Continue to contact the state administrator before board meetings to obtain more information, answers to questions, or clarification regarding agenda items.

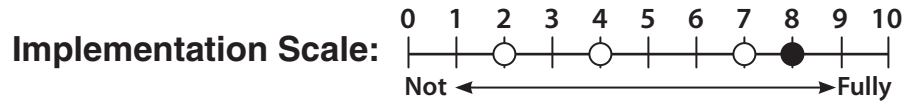## Standard Fully Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 7

March 2013 Rating: 8

Implementation Scale:

0	1	2	3	4	5	6	7	8	9	10

Not ← ———————————————— → Fully

6.9   Board Meetings

Professional Standard

Board meetings focus on matters related to student achievement.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the human resources administrator

3. Interviews with board members

4. Board agenda items and minutes that demonstrate a focus on student achievement

Summary of Third Comprehensive Review, March 2012

Information about test scores and student achievement was included on every regular board meeting agenda, and principals routinely spoke regarding school test scores. However, the board still needed to develop goals for student achievement and engage in more discussion of higher expectations for student achievement.

Summary of Fourth Comprehensive Review, March 2013

Every regular board meeting includes information about student programs and student achievement. Principals regularly address student programs, test scores and instructional goals. There has been considerable improvement in this standard, and implementation is becoming systematic.

Findings

1. Every regular board meeting agenda includes information on test scores and student achievement.

2. Board agendas and minutes include many items related to student achievement, test scores and related student programs; curriculum and instruction is clearly a priority at board meetings.

3. The last item on each regular board meeting agenda allows principals to comment on test scores, student progress and related program issues. This is a positive practice that supports the focus on students and keeps the board informed of student activities and issues.

Recommendations for Recovery

The district should:

1. Continue to include more board agenda items that focus directly on student achievement and programs to address gaps in achievement.

2. Continue to ensure that the board, under the direction of the state administrator, develops goals for, and engages in more discussion focused on, higher expectations for student achievement and improved test scores.

3. Continue working to ensure that meeting agendas allow for frequent discussion of policies related to student achievement, and that ongoing evaluation of program effectiveness is carried out.

4. Continue discussing programs to that will improve student achievement.

5. Continue discussing budget commitments to programs designed to improve student achievement.

6. Continue making information on student achievement and school programs available to the local newspaper and radio station.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 5

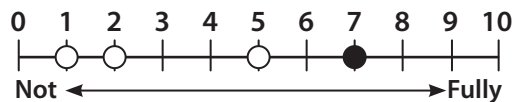March 2013 Rating: 7

Implementation Scale:

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   Not ◄──────────────────► Fully
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Table of
Community Relations
and Governance Ratings

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
1.1	PROFESSIONAL STANDARD – COMMUNICATIONS The LEA has developed a comprehensive plan for internal and external communications, including media relations.	1	1	4	7
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	2	5	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.	0	4	5	7
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.	4	5	6	7
2.8	PROFESSIONAL STANDARD – PARENT/ COMMUNITY RELATIONS Board members are actively involved in building community relations.	1	2	4	7
3.1	LEGAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS 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)	2	5	7	7
3.4	PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS 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.	1	1	4	5

Community Relations and Governance Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
3.6 PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS 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.	1	1	3	4
4.5 PROFESSIONAL STANDARD – POLICY The board supports and follows its own policies once they are adopted.	0	4	5	7
5.2 PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members receive necessary training to better fulfill their roles.	0	3	6	7
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	3	4	6
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	3	5	7
5.6 PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board and administrative team maintain functional working relationships.	0	3	5	7
5.9 PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members respect the confidentiality of information shared by the administration.	0	3	7	8

Community Relations and Governance Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 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.	0	3	5	6
5.11 PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board acts for the community and in the interests of all students in the LEA.	1	2	5	7
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.	2	4	7	8
6.9 PROFESSIONAL STANDARD – BOARD MEETINGS Board meetings focus on matters related to student achievement.	1	2	5	7
Collective Average Rating	**0.89**	**2.83**	**5.11**	**6.78**

The collective average ratings for all years are based on the subset of priority standards used in this fourth comprehensive review.

Personnel Management

1.1 Organization and Planning

Professional Standard

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

Sources and Documentation

1. Interview with the state administrator

2. Interview with the interim chief business official

3. Interview with the human resources administrator

4. Copies of September and October 2012 update from state administrator's blog, including copies of approved administrative regulations and board policies

5. Administrative Regulations 4127, 4227, and 4327, Temporary Athletic Team Coaches, adopted March 21, 2012

6. Board Policy 4020, Drug and Alcohol-Free Workplace, adopted November 16, 2011

7. Administrative Regulations 4117.11, 4217.11 and 4317.11, Preretirement Part-time Employment, adopted November 16, 2011

8. Administrative Regulation 4117.14, Postretirement Employment, adopted November 16, 2011

9. Board Policies and Administrative Regulations 4161.9, 4261.9 and 4361.9, Catastrophic Leave, adopted November 16, 2011

10. Administrative Regulations 4112.3, 4212.3 and 4312.3, Oath of Office, August 8, 2012

11. Board Policies and Administrative Regulations 4119.25, 4219.25 and 4319.25, Political Activities of Employees, adopted August 8, 2012

12. Board Policies 4135, 4235 and 4335, Soliciting and Selling, adopted August 8, 2012

13. Board Policy 4312.1, Contracts, adopted September 12, 2012

Summary of Third Comprehensive Review, March 2012

The district continued to review and revise board policies related to personnel functions and was communicating policy and administrative regulations revisions to district staff through newsletters attached to monthly pay warrants. The district had posted board policies and administrative regulations on its website.

Summary of Fourth Comprehensive Review, March 2013

The district continues to review and revise board policies and administrative regulations related to personnel functions and post them to its website. The new state administrator is communicating monthly to employees through an online blog. These communications include board actions such as adoption of policies and administrative regulations.

Findings

1. The district's personnel-related board policies and administrative regulations (Board Policy 4000 series) continue to retain the California School Boards Association (CSBA) format.

2. The district continues to review and revise board policies related to personnel functions (the 4000 series) and is communicating revisions to district staff through a monthly blog that the new state administrator maintains.

3. This standard is fully implemented and multiple years of substantial progress indicate that the standard is sustainable. The district continues to monitor its board policies and administrative regulations following the CSBA process.

4. The district continues to post all personnel-related board policies and administrative regulations on its website and is ensuring that revisions are posted as soon as they are approved by the state administrator.

Recommendations for Recovery

The district should:

1. Continue to review and revise board policies related to personnel functions (the 4000 series). Ensure that adopted policies and administrative regulations form the basis for developing the human resources department's day-to-day operating procedures, and ensure that it is in compliance with state and federal employment laws.

2. Implement personnel-related policies and procedures adopted by the board.

3. Ensure that the ongoing review and revision of board policies and administrative regulations align with the human resources department's operational needs and do not conflict with any provisions of employee collective bargaining agreements.

4. Continue to communicate revisions to board policies and administrative regulations to affected personnel, and ensure that administrators responsible for implementing and monitoring new policies have the resources to do so.

Standard Fully Implemented

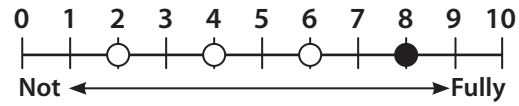February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 8

Implementation Scale:

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1.2 Organization and Planning

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Human resources department vision, mission and guiding principles statements

Summary of Third Comprehensive Review, March 2012

The department had added guiding principles to the draft vision and mission statements but had not developed annual goals or objectives linked to the vision, mission, or guiding principles, and there was no evidence that it was measuring its progress toward achieving its mission.

Summary of Fourth Comprehensive Review, March 2013

The human resources department has a vision and mission statement and has developed some annual goals and objectives linked to district's vision, mission and goals. The department is not measuring progress toward meeting annual goals or preparing an annual report for the board.

Findings

1. The human resources department is making incremental progress in this area. The department has added annual goals to the list of guiding principles that continue to communicate a commitment to diversity, nondiscrimination in the workplace, compliance with employment and labor laws, and personnel services that support the district's student achievement goals.

2. The cabinet has reviewed the department's vision, mission, guiding principles, and annual goals.

3. The department did not provide the board or the district's administration with an annual report with information about the number of staff, staffing ratios and other personnel-related matters.

Recommendations for Recovery

The district should:

1. Ensure that the human resources department continues to annually develop goals and objectives that are measurable and that help achieve its mission.

2. Develop a template and produce an annual report to the board regarding the human resources department, including the services it provides to employees and information such as the number of certificated, classified and management staff employed by the district, employees hired during the fiscal year, transfers, grievances, and retirements by classification.

3. Ensure that the annual report to the board includes evidence of progress toward meeting the department's goals and objectives for the year.
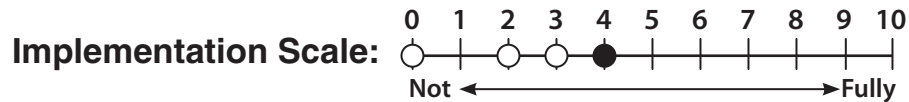
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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1.3 Organization and Planning

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Comparative analysis of human resource and payroll staffing ratios

Summary of Third Comprehensive Review, March 2012

The district's organizational chart included position titles and names of employees assigned to the human resources department. The department did not have a functional organizational chart indicating duties assigned to human resources staff.

Summary of Fourth Comprehensive Review, March 2013

The district surveyed neighboring districts to establish payroll and human resource staffing ratios, and the human resources department is developing a department reference manual. As FCMAT recommended during the previous review, because it is small department with almost all functions assigned to one staff member, human resources has begun creating a frequently asked questions (FAQ) document for human resource functions in lieu of a functional organizational chart.

Findings

1. The district surveyed neighboring school districts to compare staffing ratios for human resources and payroll positions. Four districts participated in the survey and provided information on positions and total full-time equivalent staffing (FTE). Using total average daily attendance (ADA) for each of the comparative districts, the district calculated a staffing ratio.

2. At a ratio of 524 ADA per FTE staff, the Gonzales Unified School District had the highest staffing ratio in the comparative group. The South Monterey County Joint Union High School District had the lowest ratio in the group at 976 ADA per FTE staff. The district is considering a reorganization of the human resource and business divisions to increase staff at the district office but will need to reorganize existing functions to ensure the most effective use of both existing staff and any new staff.

3. The human resources department has made some progress developing a department reference manual.

4. During the last reporting period, FCMAT indicated that a functional organizational chart lacked relevance in the district's case because the department had not added staff, and

almost all personnel operations were assigned to a single staff member. It was suggested that it may be more useful for the department to develop a list of frequently asked questions (FAQs) related to district office functions, including essential duties assigned to all operational divisions. At the time of FCMATs fieldwork, the department had started working on FAQs for human resource functions, but not all district office functions. The FAQs have not yet been communicated to the district's staff or posted to its website.

Recommendations for Recovery

The district should:

1. Based on the comparative analysis of human resource and payroll staffing, human resources and payroll are understaffed. Any reorganization of the district office should ensure that essential personnel functions are allocated to staff, with clearly articulated revised job descriptions and organizational charts. Similarly, decision making hierarchies and lines of reporting authority should be well defined.

2. Until a decision is made regarding the reorganization of district office positions, postpone development of an FAQ. If a reorganization plan is developed and implemented, FAQs related to district office functions, including essential duties assigned to all divisions, will be more important than ever. Once developed, share the FAQs, including changes to the organizational structure and functions, with all district staff through the state administrator's blog as well as on the district's website.

3. Ensure that the human resources department develops a department reference manual that lists the department's functions and uses it in part to assign human resources duties on the functional organization chart.
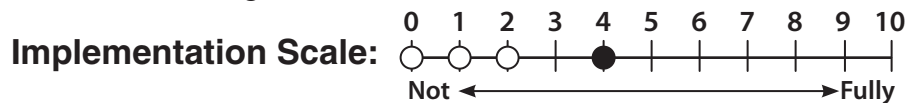
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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1.4 Organization and Planning

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. Interview with the interim chief business official

4. Cabinet meeting agendas and notes

Summary of Third Comprehensive Review, March 2012

The assistant superintendent of educational services and human resources participated in the superintendent's cabinet. The personnel manager also continued to participate. A list of duties for each position was provided but did not clearly articulate their decision-making authority.

Summary of Fourth Comprehensive Review, March 2013

The assistant superintendent of educational services and human resources was appointed as the state administrator, and the position he vacated will not be filled. The personnel manager was promoted to human resources administrator and continues to participate as a member of the state administrator's cabinet.

Findings

1. The assistant superintendent of educational services and human resources was appointed as the state administrator, and the position he vacated will not be filled.

2. The personnel manager was promoted to human resources administrator.

3. The human resources administrator is under the supervision of the state administrator and is part of his cabinet. The state administrator will continue to be involved in personnel matters including negotiations and employee discipline. Most other functions are assigned to the human resources administrator but are not clearly articulated in a revised organizational chart or revised job descriptions.

Recommendation for Recovery

The district should:

1. Ensure that the duties of the human resources administrator are clearly defined in a revised job description and/or a revised organizational chart.

2. Ensure that the human resources administrator continues to participate as a member of the state administrator's cabinet.
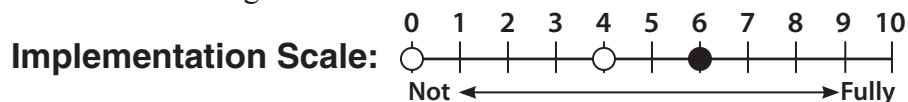
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 6

Implementation Scale:

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1.5 Organization and Planning

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 CALPADS/CBEDS reporting. The data is reviewed by the appropriate authority prior to certification.

Sources and Documentation

1. Interview with the human resources administrator

2. 2012-13 information services data calendar

Summary of Third Comprehensive Review, March 2012

The student information manager was developing a data management calendar that included activities related to the collection, certification, and submission of CALPADS, CSIS, and CBEDS reports for the district. The human resources department did not maintain a calendar of human resources annual activities related to CALPADS and CBEDS or other personnel management activities or functions. The personnel manager was providing the student information manager with information needed for CALPADS and CBEDS submissions, following the data management calendar developed by the educational services department.

Summary of Fourth Comprehensive Review, March 2013

The human resources department does not maintain a calendar as indicated in the standard; however, it provides the student information manager with information needed for CALPADS and CBEDS submissions, following the data management calendar developed by the educational services department. The human resources administrator and state administrator review CALPADS and CBEDS data prior to its certification and transmission to the state of California.

Findings

1. The student information manager has a data management calendar that lists CALPADS and CBEDS dates and activities.

2. Because personnel data has been maintained in a separate database, the human resources department took special care to ensure accuracy of the data. This was a time-consuming activity. Implementation of a new financial software system (ESCAPE) that provides the data is expected to be more efficient in the future.

3. The human resources department has not developed a data management calendar. However, it provides the student information manager with information needed for CALPADS and CBEDS submissions, following the data management calendar developed by the educational services department.

4. The human resources administrator and the state administrator review CALPADS and CBEDS data prior to its certification and transmission to the state of California.

Recommendations for Recovery

The district should:

1. Ensure that the human resources department continues to take responsibility for human resources-related data and functions related to CALPADS and CBEDS.

2. Ensure that the human resources department continues to provide the student information manager with personnel data according to the data management calendar to ensure timely submission of required state reports.

3. Develop an annual human resources calendar that indicates required activities and tasks by month, including the department's responsibility for CALPADS and CBEDS.

4. Ensure that the department supervisor continues to review all information before it is certified and transmitted to the state of California.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

Implementation Scale:

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3.5 Employee Recruitment/Selection

Legal Standard

The LEA has a system in place to routinely monitor teacher assignments for the appropriate credential authorization, including CLAD or other documents necessary to instruct English Language Learner students. (EC 44258.9, 44265.1, 44265.2, and 33126)

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. 2011-12 certificated seniority list

4. List of certificated layoffs

5. Board Resolution #14:11-12, Criteria for Determining Order of Seniority for Those Employees with the Same Date of First Paid Employment, adopted February 8, 2012

6. Board Resolution #15:11-12, Resolution To Eliminate Certain Certificated Employees Due To A Reduction Of Particular Kinds Of Services For The 2012-13 School Year, adopted February 8, 2012

7. 2011-12 Williams Assignment Monitoring Review

8. 2011-12 Monterey County Office of Education assignment monitoring reports for all school sites

9. Human resources reference manual

Summary of Third Comprehensive Review, March 2012

The human resources department had significantly improved hiring procedures by ensuring that posted vacancies were based on enrollment projections and staffing needs according to the 2011-12 master schedule for each high school. In addition, the hiring process included a procedure to ensure that applicants and candidates selected for hire were appropriately credentialed prior to positions being offered. However, this procedure had not been put in to writing or included in a department procedures manual.

Summary of Fourth Comprehensive Review, March 2013

The human resources department is consistently implementing hiring procedures to ensure that teacher candidates are appropriately credentialed and assigned. Written department procedures have significantly reduced misassignments. Recruitment, hiring and assignment procedures have been put in writing and are included in the department's procedures manual.

Findings

1. Prior to fiscal year 2008-09, the district did not have a procedure or program to routinely monitor teacher assignments for the appropriate credential authorization. Since that time, the human resources administrator has reviewed the master schedule annually to identify any misassignments.

2. The 2009-10 Williams Assignment Monitoring Review indicated seven misassignments, while the same review in 2011-12 indicated only one misassignment, which was resolved through a board resolution and application for a limited assignment permit.

3. The human resources department continues to improve hiring procedures by ensuring that authorized positions are based on enrollment projections and the needs of each school as indicated by the master schedule. The hiring process now includes a procedure to ensure that applicants and candidates selected for hire are appropriately credentialed before positions are offered, including ensuring that they possess authorizations that allow them to instruct English learner (EL) students.

4. The certificated employee seniority list includes the credentials held by each teacher as well as supplemental and EL authorizations.

5. Recruitment, hiring and assignment procedures have been put in writing and are included in the department's procedures manual.

Recommendations for Recovery

The district should:

1. Ensure that the human resources department continues to routinely monitor teacher assignments to ensure that all teachers are teaching in programs for which they are credentialed.

2. Ensure that recruitment, hiring, and assignment procedures are implemented consistently.

3. Ensure that additions or revisions to department procedures include a written hiring procedure with a timeline for master schedule development, and that they are aligned with the annual recruitment plan. Continue to develop the master schedule early so that layoffs, transfers, reassignments, recruitment and hiring continue to meet the needs of each school site. Strive for minimal assignment changes to the master schedule after school has started.

4. Continue to minimize unnecessary personnel expenses by being conservative in projecting annual enrollment. To reduce overstaffing and safeguard scarce fiscal resources, use substitutes if needed at the beginning of the school year until enrollment is settled.
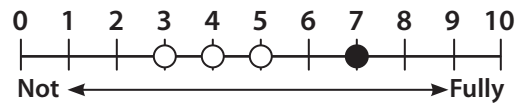
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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3.9   Employee Recruitment/Selection

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. Interview with the interim chief business official

4. Human resources reference manual

5. Randomly selected recruitment files for art, math, science, and principal positions

6. Job application forms

Summary of Third Comprehensive Review, March 2012

The human resources department developed a draft recruitment plan for 2011-12. Recruitment plan objectives were well thought out and aggressive; however, the plan neither included an action plan nor mentioned classified management and nonmanagement staff. A comprehensive written plan was still needed.

Summary of Fourth Comprehensive Review, March 2013

The human resources department has made progress on this standard and has a written recruitment plan in its department procedures manual, but it is not a comprehensive plan and does not align key recruitment tasks with dates for enrollment and staffing projections, master schedule development, layoff planning, and transfer and reassignment decisions. However, enrollment and staffing projection procedures are becoming systematic and are driving layoff and hiring decisions.

Findings

1. The human resources department developed enrollment projections for the 2011-12 school year in collaboration with the business services and curriculum and instruction divisions. Instructional program changes were taken into account when developing the master schedule and identifying staffing needs. These procedures are becoming systematic.

2. The district's layoff, reassignment and recruitment decisions were based on identified needs.

3. The recruitment plan is included in the department's procedures manual. However, the plan does not include an action plan that identifies key recruitment tasks, personnel responsible for each task, and implementation dates. In addition, it does not identify a timeline for key recruitment-related tasks such as development of the master schedule and identification of particular kinds of certificated services to be reduced for the subsequent school year. The department continues to make progress in the area of recruitment; however, a comprehensive written plan is still needed.

4. The district uses EDJOIN (www.edjoin.org) for recruitment of certificated staff, classified staff, and administrative positions; all applications for classified and administrative positions are received through EDJOIN.

5. In addition to advertising on EDJOIN, the district advertised classified positions in the local newspaper, and mailed certificated job postings to area university placement centers.

Recommendations for Recovery

The district should:

1. Continue to ensure that the human resources department works cooperatively with the business department and the school sites to develop accurate enrollment projections. Continue to take into account changes in the instructional program and their impact on the staffing needs of each school site.

2. Ensure that the recruitment plan lists the personnel responsible for various tasks and includes a timeline. The plan should also include dates for enrollment and staffing projections, master schedule development, layoff planning, and transfer and reassignment decisions. The recruitment plan should include classified management and nonmanagement positions.

3. Annually review and update written procedures for recruiting management and nonmanagement certificated and classified staff.

4. Continue to advertise classified management and nonmanagement positions on the EDJOIN website and in other venues.

5. Continue developing relationships with area universities and sending certificated job postings to university placement centers.
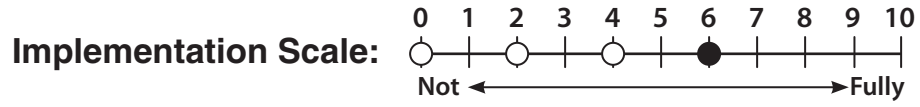
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

0	1	2	3	4	5	6	7	8	9	10

Not ← ——————————→ Fully

3.11 Employee Recruitment/Selection

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Human resources reference manual

3. Board Policy and Administrative Regulation 3580, Classification of District Records, dated March 9, 2011

4. Job descriptions for administrative positions

5. Interview questions

6. Reference check forms

7. Randomly selected recruitment files for art, math, science, and principal positions

Summary of Third Comprehensive Review, March 2012

The district consistently used the new background and reference check forms when hiring new certificated and classified employees for the 2011-12 school year. The district's procedure for filing reference check forms was developed but was not put in writing or consistently implemented.

Summary of Fourth Comprehensive Review, March 2013

Selection procedures have been developed and are becoming systematic. Reference checks are routinely performed. The human resources department is maintaining recruitment files as temporary records according to the district's records retention policy.

Findings

1. The district continues to use standard interview questions for selecting certificated and classified personnel.

2. The human resources department has developed confidentiality statements that interview panel members are required to sign prior to participating in the selection process.

3. The district consistently used standard background and reference check forms when hiring new certificated and classified employees for the 2012-13 school year.

4. The human resources department is maintaining recruitment files, which include applications, pre-employment exams, interview materials and reference check forms for all applicants. These records have been classified as temporary according to the applicable board policy and administrative regulation.

Recommendations for Recovery

The district should:

1. Continue to ensure that reference check procedures are followed consistently and that the standard reference check form is used when recommending certificated and classified management and nonmanagement candidates for hire.

2. Continue to file all reference check forms in recruitment files.

3. Retain recruitment records as temporary personnel records, and dispose of records according to the district's record retention policy.
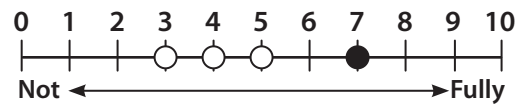
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        ├──┼──┼──○──○──○──┼──●──┼──┼──┤
          Not ←─────────────────→ Fully
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3.12 Employee Recruitment/Selection

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. Job descriptions for administrative positions

4. Randomly selected administrative evaluations plans

5. Enforcement Guidance: Reasonable Accommodation and Undue Hardship under the Americans with Disabilities Act, Equal Employment Opportunity Commission (EEOC)

6. EEOC discussion letters on essential and marginal duties

Summary of Third Comprehensive Review, March 2012

In March 2011, the district eliminated a counselor position at each school and created a new certificated management position of student/community services coordinator. The job description for this position did not identify essential duties or physical and mental demands, which were legally, required elements.

Summary of Fourth Comprehensive Review, March 2013

The district continues to struggle to select and hire school site administrators who successfully meet expectations. Two site administrators received unsatisfactory evaluations and were not re-employed for the 2012-13 school year, indicating that the district is setting high standards for site leaders.

Findings

1. The district's salaries for school administrators are competitive with salaries for similar positions in school districts statewide.

2. The district's salary and employee benefits schedules appear sufficient to enable it to recruit and maintain experienced school site administrators.

3. At the time of FCMAT's fieldwork, the state administrator had met with all principals to develop their evaluation plans. Evaluation goal areas include school culture, student learning (theory of change), and compliance. Evaluations for principals identify when and how evaluation goals will be measured. Evaluation criteria include personal

characteristics, supervision of instruction, administration and public relations. Criteria also require that principals evaluate assigned staff regularly and in a timely manner.

4. Two school site administrators received evaluations during the 2011-12 school year that identified areas of needed improvement. Both administrators were not rehired for the 2012-13 year because of a failure to meet expectations.

5. Administrative job descriptions reviewed do not contain all of the legally required elements. For example, the high school principal job description listed all duties as essential, including "other duties as assigned." According to the EEOC, the enforcing agency for the Americans with Disabilities Act (ADA), job descriptions must identify which functions are essential, and employers must make employment decisions based on the essential functions. Functions not designated essential are categorized as marginal and are not to be used as a basis for employment decisions. Both essential and marginal functions must be clearly identified in job descriptions. Entries such as "performs other duties as assigned" are not suitable for describing essential functions and may be considered prejudicial to persons with disabilities.

Recommendations for Recovery

The district should:

1. Continue to evaluate administrators based on measurable goals and criteria, including student achievement.

2. Continue to monitor administrators' progress toward meeting identified evaluation goals, including their performance in evaluating the certificated and classified employees under their supervision regularly and in a timely manner.

3. Ensure that job descriptions for administrative positions clearly communicate performance expectations and include all legally required elements.

4. Develop a process for continual ongoing updating of job descriptions. The human resources department should immediately ensure that all positions being advertised include a job description that appropriately identifies essential and marginal duties.
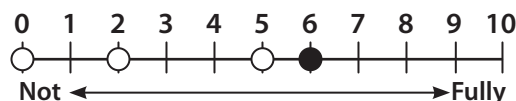
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

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     0  1  2  3  4  5  6  7  8  9  10
     ○--|--○--|--|--○--●--|--|--|
     Not ←              → Fully
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4.3 Induction and Professional Development

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)

Sources and Documentation

1. Interview with the human resources administrator

2. Human resources procedures manual

3. Memorandum to employees, Annual required notices – September 19, 2012

4. 2011-12 Keenan Safe Schools training assignment compliance

5. 2012-13 Keenan Safe Schools training assignment compliance

Summary of Third Comprehensive Review, March 2012

The district had implemented the Keenan Safe Schools online training module to provide some of the required training. The district provided required annual legal notices to all employees. New certificated and classified employees participated in new employee orientation and were informed of the requirement to participate in the online trainings. Management employees participated in on-site sexual harassment training as required.

Summary of Fourth Comprehensive Review, March 2013

The human resources department has expanded the Keenan Safe Schools online training program to include blood-borne pathogens and is providing the training in English and Spanish. The online trainings are being assigned to employees and tracked for compliance. The procedures for providing all employees with the required annual notices have been fully developed, are being monitored, and are becoming sustainable.

Findings

1. The district has developed, and continues to implement and monitor, a process to ensure that it provides and documents all required notices and in-service training sessions related to child abuse reporting and blood-borne pathogens.

2. The district is notifying employees of assigned trainings electronically, including which training courses are required and their due dates. They are able to track whether trainings are completed, incomplete, or overdue.

3. The district continues to use Keenan Safe Schools and has expanded trainings in 2012. Online training courses include diversity awareness, staff-to-staff sexual harassment, staff-to-student sexual misconduct, nondiscrimination, blood-borne pathogens, child abuse identification and reporting, electrical safety, forklift safety, science lab safety, fire extinguisher safety, material safety data sheets, and mercury spills.

4. The district sent the required annual legal notices to employees and filed the signed cover sheet in each employee's personnel file.

Recommendations for Recovery

The district should:

1. Continue to support the human resources administrator in implementing the Keenan Safe Schools training program and ensuring that all district employees satisfy the online training requirements including, but not limited to, child abuse reporting, blood-borne pathogens, drug- and alcohol-free workplace, sexual harassment prevention, diversity training, and nondiscrimination.

2. Continue to refine the process for sending and documenting required notices to employees annually. Consider implementing a paperless process.
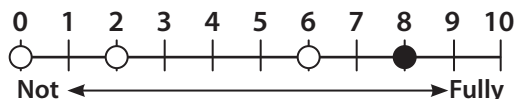
Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 8

Implementation Scale:

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   0  1  2  3  4  5  6  7  8  9  10
   ○──┼──○──┼──┼──┼──○──┼──●──┼──┼
   Not ◄─────────────────► Fully
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4.5 Induction and Professional Development

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.

Sources and Documentation

1. Interview with the human resources administrator

2. New employee checklists

3. 2012-13 new teacher orientation agenda and sign-in sheets

4. Revised new teacher handbook and progress made to date on a new administrators' handbook

5. Personnel files

Summary of Third Comprehensive Review, March 2012

The district had developed a checklist to ensure that new hires submitted all legally required documents before their first day of work. The district developed and was distributing a handbook for new certificated employees but had not developed an equivalent handbook for new classified employees or conducted orientation for substitute employees.

Summary of Fourth Comprehensive Review, March 2013

The district continues to implement a program of new certificated and classified employee orientation, and uses the new employee checklist to ensure that new hires submit all legally required documents before their first day of work. The handbook for new certificated employees has been revised and the administrative handbook was in development during this review.

Findings

1. The district continues to implement a program of new certificated and classified employee orientation, and uses a new employee checklist to ensure that newly hired employees submit all legally required documents before their first day of work and that these documents are filed in an employee's personnel file.

2. Orientation for substitute custodians is being provided by the maintenance, operations, transportation and facilities director.

3. Orientation for substitute paraprofessionals is being provided by the special education director and the human resources administrator.

4. No orientation is provided to teacher substitutes.

5. The district has revised the new certificated employee handbook and continues to provide it to all new certificated employees during orientation. An equivalent handbook for new classified employees has not been developed. An equivalent handbook for new administrators was being developed during this review.

Recommendations for Recovery

The district should:

1. Provide orientation meetings for substitute teachers.

2. Continue to develop a rich program of orientation for certificated and classified employees. Ensure that the program meets new employees' needs by developing an orientation evaluation that helps assess the orientation's effectiveness and determines what other information new employees want to know or learn more about.

3. Develop employee handbooks for classified employees, as has been done for certificated employees, and include the handbooks as part of the employee orientation process.

4. Complete the new administrators' handbook that is being developed and ensure that it is provided to new administrators during an orientation program.

5. Continue to ensure that the hiring process includes completion of the new employee checklist and filing of the checklist in the employee's personnel file.

Standard Partially Implemented
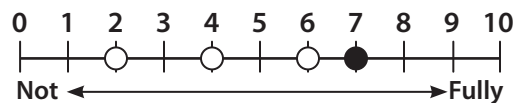
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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     |--+--o--+--o--+--o--●--+--+--|
      Not ◄────────────────► Fully
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5.1 Operational Procedures

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Employee leave tracking sheet, balances as of June 30, 2012

Summary of Third Comprehensive Review, March 2012

The district's vacation and compensatory time off liability had been minimally reduced. Some time was paid out at the end of the 2010-11 school year, but large balances remained and a plan to eliminate the current liability had not been developed. A procedure for monitoring vacation accruals had not been developed, and departments had not developed annual vacation schedules.

Summary of Fourth Comprehensive Review, March 2013

The district's vacation and compensatory time off liability has been significantly reduced. The existing liabilities are minimal and are being eliminated through a multiyear approach. The district has not developed a procedure for monitoring vacation accruals, and departments have not developed annual vacation schedules.

Findings

1. The district is tracking employee leave for all groups. For classified employees, the district is also tracking vacation accruals, overtime and compensatory time.

2. Vacation liabilities have been significantly reduced as the result of a multiyear approach. Employees with excess accruals are having their vacations scheduled to eliminate the excess.

3. The district's compensatory time off liability has been eliminated according to the June 30, 2012 balance sheet.

4. The district has eliminated the use of overtime and compensatory time off without prior approval.

5. The district has not developed a procedure for monitoring vacation accruals, and departments have not developed annual vacation schedules. The district is not requiring

employees to submit vacation requests or face having their vacations scheduled by their supervisor based on their department's operational needs.

Recommendations for Recovery

The district should:

1. Continue to work toward eliminating excess vacation liability.

2. Develop a procedure for monitoring vacation time that ensures employees do not exceed the maximum accrual. If an employee's vacation accrual exceeds the maximum allowed by the collective bargaining agreement, it should be paid out or the employee's supervisor should schedule the employee's time off.

3. Continue to ensure that supervisors limit the use of compensatory time and that any overtime is approved in accordance with Article 5.8.4 of the classified collective bargaining agreement. When compensatory time is required, work with site and department supervisors to ensure that compensatory time is paid or used in the period in which it is earned.

4. Develop an annual report of all leave earned and taken by each employee and in the district as a whole.

Standard Partially Implemented

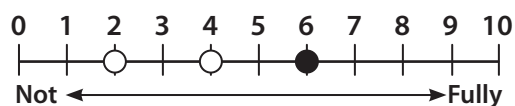February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

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0   1   2   3   4   5   6   7   8   9   10
|---+---O---+---O---+---●---+---+---+---|
Not  ◄──────────────────────────►  Fully
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5.3 Operational Procedures

Legal Standard

Transfer and reassignments — LEAs that have been identified as Program Improvement are subject to corrective action including demotion or reassignment of school staff. (EC 52055.57, 20 USC 6316)

Sources and Documentation

1. Interview with the human resources administrator

Summary of Third Comprehensive Review, March 2012

The district carried out demotions and reassignments of management or nonmanagement school staff related to its Program Improvement status. Voluntary requests for transfer were filed for 2011-12. One involuntary transfer was made based on enrollment projections.

Summary of Fourth Comprehensive Review, March 2013

The district's Program Improvement status did not necessitate demotions or reassignments of management or nonmanagement school staff for the 2012-13 school year. One voluntary transfer request was filed and granted.

Findings

1. At the time of fieldwork both school sites had new administrations, except for one returning assistant principal, who was subsequently promoted to principal and moved to the other high school.

2. One voluntary request for transfer was filed for 2012-13 and was granted.

Recommendations for Recovery

The district should:

1. Continue to ensure that applicable provisions of the Education Code are followed when considering transfer requests and making teacher assignments related to the district's Program Improvement status.
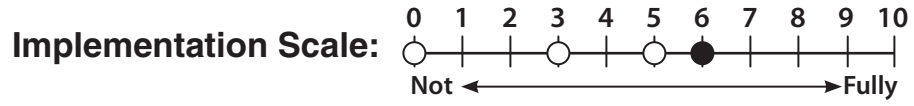
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

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      0   1   2   3   4   5   6   7   8   9  10
      ○───┼───┼───○───┼───○───●───┼───┼───┼───
         Not ←                    → Fully
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5.4 Operational Procedures

Legal Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Human resources procedures manual

3. New employee checklist

4. Randomly selected certificated, classified and management personnel files

Summary of Third Comprehensive Review, March 2012

The human resources department continued to make significant progress in organizing personnel files and filing required documents annually. The department developed a checklist for annual updates of personnel files and provided supervisors with lists of classified and certificated employees due for evaluation in 2010-11. Certificated evaluations were completed and available for review.

Summary of Fourth Comprehensive Review, March 2013

The human resources department has implemented procedures to organize personnel files and to file required documents. The procedures are becoming systematic. Personnel files were available for inspections, were well organized and were stored in a secured area.

Findings

1. The human resources department has developed a checklist of annual updates for each type of personnel file. These procedures are becoming systematic, and the department continues to file the appropriate documentation.

2. Required annual notices were sent to all employees at the beginning of the 2011-12 school year and were filed in employees' personnel files.

3. Individual personnel files are available for employees to inspect.

4. The file room is well organized and secure.

Recommendation for Recovery

The district should:

1. Ensure that the human resources department continues to consistently use the personnel file checklist and file the appropriate documentation annually, including, but not limited to, annual evaluations and required annual legal notices.

Standard Partially Implemented
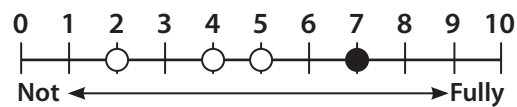
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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    Not ←              →Fully
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5.5 Operational Procedures

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Human resources procedures manual

Summary of Third Comprehensive Review, March 2012

The department did not have desk manuals; it had used consultants and/or retirees to help implement the recovery plan. Developing desk manuals and written operational procedures remained secondary to completing day-to-day work.

Summary of Fourth Comprehensive Review, March 2013

The department has made substantial progress in developing a department procedures manual. Though not yet fully developed, the manual defines many essential procedures. However, the department has not created desk manuals to aid cross-training for employees.

Findings

1. The human resources department has made substantial progress in developing a department procedures manual in the absence of additional staffing. Staff have developed written procedures while managing day-to-day operations.

2. Although not yet complete, the manual being developed defines many essential procedures, including, but not limited to, recruitment and hiring, contract management and grievance processing, and processing of personnel requisitions. It also contains a calendar of required monthly human resources activities and best practices.

3. The district has effectively documented many essential procedures, but because the department is very small, it has not developed specific desk manuals for each position. The district has not identified or trained backup personnel to perform essential personnel-related functions. This is an essential next step in the implementation of all elements of this standard.

Recommendations for Recovery

The district should:

1. Continue to develop written procedures for essential human resources functions as well as refine existing procedures.

2. Identify and train backup personnel to perform essential human resources functions, at least until additional staff are assigned to the human resources department or some human resource functions are reallocated.
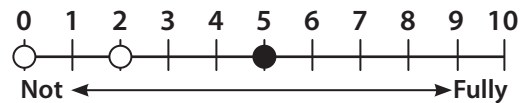
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 5

Implementation Scale:

5.7 Operational Procedures

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Human resources department procedures manual

Summary of Third Comprehensive Review, March 2012

The CBO and the personnel manager met regularly but informally, continued to have a positive working relationship, and were able to quickly resolve any payroll questions or errors related to employees' status and paperwork. Because the district's success in this area depends on the employees involved and the positive working relationship between the CBO and personnel manager rather than formal procedures, a change in staffing could result in inefficiencies and more payroll errors.

Summary of Fourth Comprehensive Review, March 2013

The district continues to rely on positive working relationships rather than well-defined procedures to resolve payroll errors. The human resources department has developed written procedures for processing personnel requisitions; these procedures clearly identify the responsibilities of human resources and payroll staff.

Findings

1. The antiquated and ineffective separate and manual systems that the payroll and human resources departments maintain to manage budget and personnel data are being replaced with a fully-integrated position control system. The Monterey County Office of Education has purchased and is converting to the ESCAPE financial software system. When fully implemented and operational, the system should ensure accuracy and eliminate duplication.

2. The human resources department has developed written procedures for processing personnel requisitions. The procedures clearly identify the responsibilities of human resources and payroll staff.

Recommendations for Recovery

The district should:

1. Review and revise procedures for processing personnel requisitions after the ESCAPE system has been fully implemented to ensure that they align with the requirements of the new system and that the roles and responsibilities of human resources and payroll staff are defined accurately.

2. Ensure that the human resources and payroll departments work together to develop well-articulated procedures for resolving payroll errors.
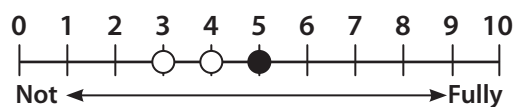
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

5.8 Operational Procedures

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Training certificate, Beyond the Basics: Advanced Training for HR Administrators, October 19, 2012

3. Purchase order and registration confirmation for online training dated October 15, 2012, Fiscal Aspects of Negotiations

4. Registration for Lozano Smith's Labor and Employment Webinar series; confirmation e-mail dated August 15, 2012 – four sessions

5. Monterey County Office of Education ESCAPE training calendar for 2012-13

Summary of Third Comprehensive Review, March 2012

The personnel manager was scheduled to attend the Credential Counselors and Analysts of California (CCAC) Credential Conference and the CalPERS disability seminar, and the district office receptionist was to attend the annual Substitute Employee Management System (SEMS) conference. Backup personnel for essential functions had not been identified.

Summary of Fourth Comprehensive Review, March 2013

The district is investing in the professional growth and development of the human resources department's one staff member. The human resources administrator has attended multiple trainings in personnel management best practices and current issues.

Findings

1. On October 19, 2012, the human resources administrator attended the School Services of California, Inc. advanced workshop, Beyond the Basics: Advanced Training for HR Administrators.

2. The human resources administrator registered for the School Services of California, Inc. online Fiscal Aspects of Negotiations workshop on October 15, 2012.

3. The human resources administrator registered for Lozano Smith's Labor and Employment Webinar series. Registration for the series' four scheduled sessions was received on August 15, 2012.

4. The human resources administrator is receiving ESCAPE training according to the Monterey County Office of Education's ESCAPE training calendar for 2012-13.

Recommendations for Recovery

The district should:

1. Annually identify the training needs of human resources staff and the availability of trainings that meet those needs.

2. Provide a training budget to ensure that resources are allocated for this purpose and that the department is strategic in selecting trainings each year.

3. Ensure that the human resources department has a representative at all personnel-related trainings provided by the Monterey County Office of Education.

Standard Partially Implemented

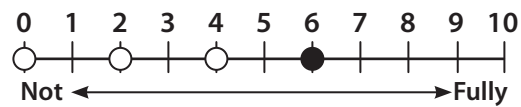February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

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        Not ◄──────────────────► Fully
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5.10 Operational Procedures

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Human resources department procedures manual

4. List of classified employee full-time equivalent (FTE) by school site

5. District enrollment and master schedules for 2011-12 and the first semester of 2012-13

Summary of Third Comprehensive Review, March 2012

Overstaffing of certificated employees had been significantly reduced. The Greenfield and King City high school master schedules indicated an average enrollment of approximately 31 students per class period and few class periods with fewer than 17 students enrolled.

Summary of Fourth Comprehensive Review, March 2013

The district continues to staff conservatively to avoid any certificated overstaffing. Layoff notices for 2012-13 were issued based on enrollment projections. An increase in enrollment at Greenfield High School required the reemployment of social science and math teachers.

Findings

1. The collective bargaining agreement with certificated staff has historically contained maximum class size, student contact parameters and student-to-adult ratios for certificated support personnel. Staffing ratios were not followed in the past, resulting in overstaffing. During the 2009-10 school year, the district and the certificated bargaining unit negotiated changes to the contract article regarding class size. The ratified agreement eliminates the 32-to-1 ratio maximum and specifies a maximum of 35 students per class period and 170 student contacts per day. The ratified agreement also provides for overage payments when the per-period or per-day maximums are exceeded.

2. Certificated overstaffing has been significantly reduced. Layoff notices for 2012-13 were issued based on enrollment projections. An increase in enrollment at Greenfield High School required the reemployment of social science and math teachers.

3. Classified staffing formulas have not been developed.

Recommendations for Recovery

The district should:

1. Continue to develop an instructional staffing schedule for each school based on enrollment projections and students' needs. Staff schools at or near the contractual maximums.

2. Ensure that the human resources department works cooperatively with the business department and the school sites to develop accurate enrollment projections no later than January of each year. Take into consideration changes in the instructional program when identifying staffing needs for subsequent years. Consider enrollment projections, changes in the instructional program, and students' needs when developing master schedules.

3. Develop a timeline for staffing and enrollment projections that identifies site and district administrators' roles and responsibilities. The timeline should ensure that necessary reductions in certificated service are identified by the end of January so they can be made within the statutory timeline and preliminary layoff notices issued by March 15.

4. Continue to monitor enrollment and class sizes after the school year begins to determine if second semester staffing should be adjusted and to help ensure that staffing levels remain constant throughout the school year.

5. Develop school site and district office staffing formulas for classified employees to ensure consistency between sites.

6. Ensure that staffing formulas are based on full-time equivalents and that they indicate the work year for each program and school site.

Standard Partially Implemented

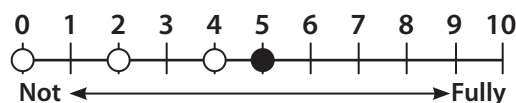February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

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7.1 Use of Technology

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the chief business official

3. Human resources department procedures manual

4. Written procedures for processing personnel requisitions

5. Monterey County Office of Education ESCAPE training calendar for 2012-13

Summary of Third Comprehensive Review, March 2012

The Monterey County Office of Education had not yet signed a contract with a vendor for a new financial system. The human resources department was to continue using the current system, ACCESS, to manage personnel data. An advantage of this homegrown system was that it required minimal support. The disadvantage was that there was no ability to share the data and it was not integrated with budget and payroll.

Summary of Fourth Comprehensive Review, March 2013

The Monterey County Office of Education (county office) has purchased the ESCAPE financial software, which is a fully integrated budget, personnel, and payroll system. When fully implemented, the system should ensure accuracy and eliminate duplication. However, the position control system is human resources-driven and will place increased demands on the department.

Findings

1. At the time of FCMATs fieldwork, the district was working with the county office on implementing the new ESCAPE financial system, which is a fully-integrated budget, personnel, and payroll system. District staff are participating in training and following the county office's roll-out calendar.

2. When fully implemented and operational, the system should ensure accuracy and eliminate duplication. However, the position control system is driven by the human resources department and will place increased workload demands on the department, which could require essential human resources functions to be closely examined and potentially reallocated.

3. The human resources administrator may need additional staff support when the ESCAPE system is implemented. That support may require a higher level of technical skills and abilities than is currently required of positions supporting human resource functions.

4. The district is consistently using personnel requisitions to ensure that only authorized and funded positions are posted and filled. The procedures for processing personnel requisitions have been put into writing and incorporated into the human resources procedures manual.

Recommendations for Recovery

The district should:

1. Fully implement the new financial system to ensure accurate and effective position control. Carefully review how essential human resource functions are allocated to meet any increased work demands.

2. Review position descriptions to ensure that positions' knowledge, skills, and abilities align with the department's requirements and technical needs.

3. Continue to use new personnel requisition forms to ensure that only authorized and funded positions are posted and filled.

4. Review and revise procedures for processing personnel requisitions once the ESCAPE system has been fully implemented to ensure that they align with the new system's requirements and that the roles and responsibilities of human resources and payroll staff are accurately defined.
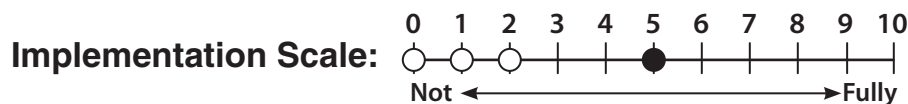
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

Implementation Scale:

7.2 Use of Technology

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)

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Interview with the director of technology

4. Monterey County Office of Education ESCAPE training calendar for 2012-13

Summary of Third Comprehensive Review, March 2012

At the time of FCMAT's review, the county office had not yet selected a new countywide financial system. As recommended during the second comprehensive review, when a new system is selected, the district should ensure that human resources staff receive adequate training and support.

Summary of Fourth Comprehensive Review, March 2013

The district is working with the county office on implementing the new ESCAPE financial software system. The human resources department needs to assess employees' skills and any new skills the new system will require. The district should ensure that department staff continue participation in all county office trainings on the new financial system.

Findings

1. At the time of FCMATs fieldwork, the district was working with the county office on implementation of the new ESCAPE financial software system, which is a fully integrated budget, personnel and payroll system. District staff are participating in training and following the county office's implementation calendar for the system.

2. The district does not assess human resources and payroll employees' skills and knowledge of software and systems used. Such an assessment will be essential to the successful implementation of the new financial system.

Recommendations for Recovery

The district should:

1. Conduct an assessment of employees' skills in the use of all technology systems and any new skills that the new financial system will require.

2. Ensure that human resources department staff continue to participate in all county office trainings related to the new financial system.

3. Create a professional development plan that ensures that human resources staff and other district office staff assigned human resource functions have the knowledge, skills and abilities needed to perform required duties.
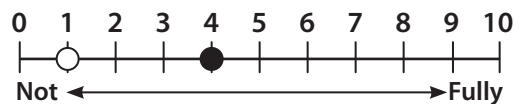
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 4

Implementation Scale:

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        Not ◄───────────────────────────► Fully
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8.1 Evaluation/Due Process Assistance

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. List of completed evaluations

4. E-mails to site and department managers listing employees to be evaluated during the 2011-12 school year

5. Human resources department procedures manual including performance evaluation procedures for management and nonmanagement classified and certificated employees

Summary of Third Comprehensive Review, March 2012

During 2010-11, school site administrators completed the required certificated evaluations and documentation. School site and department administrators did not complete all required classified evaluations. The state administrator evaluated department directors and school principals, and site principals were expected to evaluate assistant principals.

Summary of Fourth Comprehensive Review, March 2013

The district continues to ensure that certificated evaluations are completed as required by the collective bargaining agreement. Although the new certificated employee evaluation system is more rigorous and helps the district decide whether to retain employees, it lacks a process to provide struggling employees with meaningful assistance and support. Considerable progress was made during the 2011-12 school year in the area of classified evaluations.

Findings

1. The human resources administrator is responsible for monitoring evaluations of certificated and classified management and nonmanagement staff.

2. The human resources administrator is responsible for providing administrators with the necessary evaluation forms and communicating evaluation procedures and timelines.

3. Evaluation dates are maintained in the employee database.

4. The district continues to ensure that certificated staff evaluations are completed as required by the collective bargaining agreement. Considerable progress was made during the 2011-12 school year in the area of classified evaluations.

5. Historically, management employees have not been evaluated regularly. In 2011-12 the state administrator evaluated department directors and schools site principals. School principals are expected to evaluate their assistant principals.

6. The district has developed a standard evaluation process for management employees that include evaluation criteria, procedures and forms. The evaluation procedures have been refined for the 2012-13 school year.

7. The district elected to discontinue the employment of six certificated nonmanagement employees at the end of the 2011-12 school year. Although the new certificated evaluation system is more rigorous and helps the district make important decisions about whether to permanently retain employees, it does not include an improvement planning process that offers struggling employees with meaningful assistance and support.

Recommendations for Recovery

The district should:

1. Ensure that supervising managers follow the 2012-13 evaluation schedules provided by the human resources department for certificated and classified employees.

2. Hold supervising mangers accountable for completing evaluations in accordance with the provisions of the collective bargaining agreements with certificated and classified employees.

3. Develop and implement a performance improvement plan form and process that identifies performance deficiencies and offers struggling employees meaningful assistance and support. The improvement plan should document what the employee needs to change, what evidence will demonstrate progress, when progress will be measured, who will support the employee and monitor progress, and what resources will be offered to ensure success.

Standard Partially Implemented
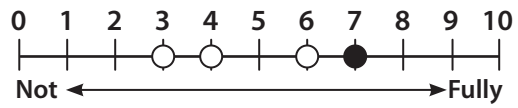
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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8.3 Evaluation/Due Process Assistance

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the state administrator

3. List of completed evaluations

4. E-mails to site and department managers listing employees to be evaluated during the 2011-12 school year

5. Human resources department procedures manual including performance evaluation procedures for management and nonmanagement classified and certificated employees

6. Personnel files

Summary of Third Comprehensive Review, March 2012

The district had made measurable progress toward ensuring that certificated employees were evaluated annually. One employee had inadequate performance but resigned before the district could implement a formal improvement plan.

Summary of Fourth Comprehensive Review, March 2013

Certificated and classified employees are being evaluated according to the criteria set forth in their respective collective bargaining agreements. The district has implemented more rigorous evaluations for site and department administrators and for certificated employees, and takes seriously any decision to grant permanent employment status. However, the district has not yet developed a process to offer struggling employees meaningful support.

Findings

1. Article XV of the collective bargaining agreement with certificated employees, titled Certificated Employee Evaluation, contains an evaluation process for probationary and permanent employees. Newly negotiated evaluation criteria are based on the California

Standards for the Teaching Profession, and new evaluation forms reflect these changes to Article XV.

2. Article X of the collective bargaining agreement with classified employees, titled Evaluation Procedures, details the evaluation procedures for classified employees.

3. Based on their performance, the employment of six probationary certificated employees and two site administrators was not continued, indicating that the district takes seriously its responsibility for the decision to grant permanent employment status. Although the new certificated evaluation system is more rigorous and helps the district make important decisions about whether to grant permanent employment status, it does not include an improvement planning process that offers struggling employees with meaningful assistance and support.

4. The human resources department has developed written procedures related to performance evaluations. The procedure identifies the roles and responsibilities of the human resources administrator, the state administrator, and site and department managers.

5. The district provided site and department supervisors with training regarding evaluation criteria, procedures, timelines and forms.

6. The human resources department provides site and department supervisors with lists of certificated and classified employees who are due for evaluation.

Recommendations for Recovery

The district should:

1. Ensure that supervising managers continue to follow the 2012-13 schedules provided by the human resources department for evaluating certificated and classified employees.

2. Hold supervising mangers accountable for completing evaluations in accordance with the provisions of the collective bargaining agreements with certificated and classified employee groups.

3. Create a procedure for developing improvement plans for struggling employees. An improvement plan should include, but may not be limited to, the following:

    a. Goals and objectives: what does the employee need to change?

    b. Evidence and artifacts: what evidence will demonstrate progress toward meeting the desired goals and objectives? Timeline: when will progress be measured?

    c. Monitoring: who will support the employee and monitor progress?

    d. Identification of resources

    e. Date of the next review

f. Employee and evaluator signatures

Standard Partially Implemented
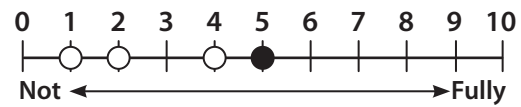
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

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     ├──○──○──┼──○──●──┼──┼──┼──┤
     Not ◄─────────────────► Fully
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9.2 Employee Services

Professional Standard

The personnel function has developed recognition programs for all employee groups.

Sources and Documentation

1. Interview with the human resources administrator

2. Board Resolution #16: 11/12, adopted April 17, 2012, Proclaiming and Honoring California Day of the Teacher, May 9, 2012

3. Board Resolution #17:11/12, adopted April 17, 2012 Proclaiming and Honoring Classified School Employee Week, May 20 – 26, 2012

4. List of employees recognized for years of service

Summary of Third Comprehensive Review, March 2012

Awards for years of service were presented to employees at the May 2011 regular meeting of the governing board. The state administrator acknowledges "stars" by sending a personal note thanking them for their service above and beyond the call of duty. "Stars" are identified by members of the administrative team.

Summary of Fourth Comprehensive Review, March 2013

Awards for years of service were presented to employees at the May 9, 2012 regular meeting of the governing board. The new state administrator has continued to acknowledge employees for service above and beyond the call of duty and is recognizing them in his monthly blog.

Findings

1. The district has been wary of implementing a recognition program at a time when employees have made significant concessions in compensation and working conditions. However, the district now has an employee recognition policy.

2. The district provides employees with a certificate for years of service near the end of each year. Awards for years of service were presented to employees at the May 9, 2012 regular meeting of the governing board.

3. Members of the state administrator's cabinet continue to discuss at each cabinet meeting those employees who have gone above and beyond the call of duty and whom members of cabinet feel deserve recognition. The state administrator writes and sends a personal note to each of these employees and spotlights their contributions in his monthly blog.

Recommendations for Recovery

The district should:

1. Continue a program of awards for years of service.

2. Continue to identify and recognize exemplary employees and recognize them through regular communication.

3. Consider the human resources department's capacity to meet current service demands when implementing any recognition program that requires this department's assistance, and strive to provide a highly authentic recognition process.
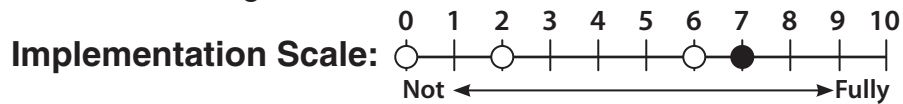
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

10.2 Employer/Employee Relations

Professional Standard

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

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Interview with the state administrator

4. Public Notice of Initial District Proposal to the King City Joint Union High School District Teachers Association Contract, April 17, 2012

5. Public Notice of Initial District Proposal to the California State Employees Association Local Chapter 529 Contract, April 17, 2012

Summary of Third Comprehensive Review, March 2012

The district settled a number of outstanding articles with both the certificated and the classified employee bargaining groups. Employee groups agreed to a number of concessions resulting in significant savings. However, the district was expected to use its entire state loan by the end of 2013-14 because of continued deficit spending. The district would need to negotiate further reductions before the 2013-14 school year to avoid the need for an additional emergency appropriation.

Summary of Fourth Comprehensive Review, March 2013

The district presented its initial proposals to the certificated and classified employee collective bargaining units at the April 17, 2012 regular meeting of the governing board. At the time of fieldwork, the district and the CSEA were bargaining and several sessions were being scheduled with the teachers' association. Because it is expected to use its entire state loan by the end of 2013-14, the district will need to negotiate concessions with both employee groups.

Findings

1. Prior to 2009-10, the superintendent and the chief business official represented the district in labor negotiations.

2. In the past, individual board members involved themselves in the collective bargaining process with the certificated employees' association. Although the state administrator is not required to involve board members in negotiation, he discusses negotiation issues with the board in closed sessions, including possible contract changes, the affordability of proposals, and other relevant information.

3. The district presented its initial proposals to the certificated and classified employee collective bargaining units at the April 17, 2012 regular meeting of the governing board. At the time of fieldwork, the district and the CSEA were bargaining and several sessions were being scheduled with the teachers' association.

4. The district's proposals were made public in accordance with provisions of the government code, but it does not appear that a public hearing was held to allow for public input and acceptance of the proposals by the state administrator and board.

5. Negotiation proposals contained core values and negotiations parameters.

6. The state administrator, interim chief business official and human resources administrator will serve on the certificated and classified management bargaining teams. In addition, one principal will serve on the certificated management bargaining team and one assistant principal will serve on the classified management bargaining team.

7. The district is projected to use its entire state loan by the end of the 2013-14 school year if no expenditure reductions are made. The district will need to successfully negotiate reductions through concessions with its employees' collective bargaining units before the start of the 2013-14 school year to avoid the need for an additional emergency appropriation from the state.

Recommendations for Recovery

The district should:

1. Continue to include board members in establishing goals for negotiations; however, continue to refrain from including individual board members in the collective bargaining process.

2. Continue to make initial contract proposals public in accordance with Government Code 3547 (a) and 3547 (b). In addition, ensure that a public hearing is held at a meeting other than the meeting at which public notice was first given.

3. If agreements cannot be reached with the employees' collective bargaining units by March 2013, consider declaring impasse. Impasses take time, and the district must allow sufficient time for an agreement to be reached through mediation or if necessary be prepared to impose concessions before the start of the 2013-14 school year.

4. Ensure that the governing board (after the return of local governance) or the state administrator (until the return of local governance) represents the public's interest in the collective bargaining process by doing the following:

    a. Ensure that proposals and agreements balance staff needs and the district's priorities to provide students with a high quality instructional program based on a sound, realistic and affordable budget.

b. Continually review standards of conduct pertaining to the negotiations process for board members and members of the bargaining team.

c. Continue to hold meetings related to negotiations in closed session in accordance with Government Code 3549.1 when state law (e.g., the Brown Act) does not require open public meetings. Matters discussed in closed meetings should be kept in strict confidence.

d. Continue to provide employee organizations with accurate information regarding the district's financial resources.

e. Continue to closely monitor the progress of negotiations and carefully consider how proposed contract provisions would affect the district's short- and long-term fiscal, programmatic, instructional and personnel goals.

f. Keep the public informed about the progress of negotiations and how negotiations may affect the district's goals.
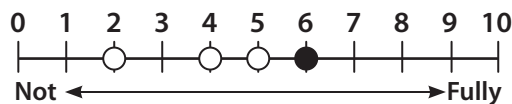
Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

10.3 Employer/Employee Relations

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Interview with the state administrator

4. Human resources department procedures manual

5. Written procedures for contract management and grievance processing

Summary of Third Comprehensive Review, March 2012

The district did not have a plan for implementing this standard, and no documentation was provided.

Summary of Fourth Comprehensive Review, March 2013

The department has developed written procedures for contract management and grievance processing and has included them in the department procedures manual, but they have not been shared with site and department managers. The district does not have a plan for implementing this standard.

Findings

1. The district's grievance procedure is documented in the collective bargaining agreements with certificated and classified employees.

2. The human resources department has developed written procedures for contract management and grievance processing that are aligned with the employee collective bargaining agreements, and has included these procedures in the department procedures manual.

3. The district lacks a formal plan to provide managers with training in contract management and grievance processing.

Recommendations for Recovery

The district should:

1. Ensure that management personnel are trained in the grievance process and that there is a procedure that ensures communication with human resources department staff when a grievance is initiated. The human resources administrator should work closely with managers to ensure that grievances are resolved at the lowest possible level.

2. Develop and implement a districtwide training program for all management personnel that focuses on managing and administering the district's current labor agreements.

Standard Partially Implemented

February 2010 Initial Rating: 0
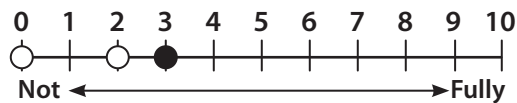
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

Implementation Scale:

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10.4 Employer/Employee Relations

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.

Sources and Documentation

1. Interview with the human resources administrator

2. Interview with the interim chief business official

3. Interview with the state administrator

4. Public notice of initial district proposal to the King City Joint Union High School Teachers Association contract, April 17, 2012

5. Public notice of initial district proposal to the California State Employees Association Local Chapter 529 contract, April 17, 2012

Summary of Third Comprehensive Review, March 2012

The district settled a number of outstanding articles with the certificated employee bargaining group. Employee groups agreed to a number of concessions, resulting in significant savings. However, the district was expected to draw down the entire state loan by the end of 2013-14 due to continued deficit spending. The district would need to successfully negotiate reductions before the 2013-14 school year to avoid the need for an additional emergency appropriation.

Summary of Fourth Comprehensive Review, March 2013

The district presented its initial proposals to the certificated and classified employee bargaining groups at the April 17, 2012 regular meeting of the governing board. At the time of FCMAT's fieldwork, the district and classified employee bargaining group were bargaining and several sessions were being scheduled with the teachers' association. Because the district is expected to use its entire state loan by the end of 2013-14, the district will need to negotiate concessions with both employee groups.

Findings

1. Even with existing negotiated agreements and concessions reached in recent years, the district is expected to draw down the entire state loan by the end of 2013-14 because of continued deficit spending. Because 79.38% of its unrestricted general fund expenses are for salaries and benefits, it will be difficult for the district to regain fiscal solvency without additional reductions in these areas.

2. The district presented its initial proposals to the certificated and classified employee bargaining groups at the April 17, 2012 regular meeting of the governing board. At the time of FCMAT's fieldwork, the district and the classified employee bargaining group were bargaining, and several sessions were being schedule with the teachers' association.

3. Negotiation proposals contained core values and negotiations parameters.

4. The state administrator, interim chief business official and human resources administrator will serve on the certificated and classified management bargaining teams. In addition, one principal will serve on the certificated management bargaining team and one assistant principal will serve on the classified bargaining management team.

5. The district will need to successfully negotiate reductions before the start of the 2013-14 school year to avoid the need for an additional emergency appropriation from the state.

Recommendations for Recovery

The district should:

1. Conduct additional analysis of the collective bargaining agreements to analyze areas of significant fiscal impact to the district and those that limit management's ability to manage resources effectively. Use the results of the contract analysis to influence and shape future proposals by the district.

2. Consider declaring impasse if agreements cannot be reached by March 2013 to allow sufficient time for an agreement to be reached through mediation, or, if necessary, be prepared to impose concessions before the start of the 2013-14 school year.

3. Continue to involve the human resources and business departments in negotiations to provide management and the board with information on the impact of bargaining proposals.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 5

March 2012 Rating: 6

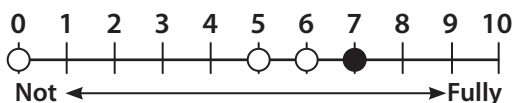March 2013 Rating: 7

Implementation Scale:

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Table of
Personnel Management Ratings

Personnel Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
1.1 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The LEA has clearly defined and clarified roles for board and administration relative to recruitment, hiring, evaluation and discipline of employees.	2	4	6	8
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.	0	2	3	4
1.3 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function has an organizational chart and functions chart and a menu of services that include the names, positions and job functions of all personnel staff.	0	1	2	4
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.	0	4	6	6
1.5 PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function has a data management calendar that lists all the ongoing data activities and responsible parties to ensure meeting critical deadlines on CALPADS/CBEDS reporting. The data is reviewed by the appropriate authority prior to certification.	0	2	3	6
3.5 LEGAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION The LEA has a system in place to routinely monitor teacher assignments for the appropriate credential authorization, including CLAD or other documents necessary to instruct English Language Learner students. (EC 44258.9, 44265.1, 44265.2, and 33126)	3	4	5	7

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
3.9	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/SELECTION 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	2	4	6
3.11	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/SELECTION Selection procedures are uniformly applied. The LEA systematically initiates and follows up and performs reference checks on all applicants being considered for employment.	3	4	5	7
3.12	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/SELECTION The LEA recruits, selects, and monitors principals with strong leadership skills, with a priority on placement of strong leaders at underperforming schools.	0	2	5	6
4.3	LEGAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT 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)	0	2	6	8
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.	2	4	6	7
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.	2	4	4	6

Personnel Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
5.3 LEGAL STANDARD – OPERATIONAL PROCEDURES Transfer and reassignments – LEAs that have been identified as Program Improvement are subject to corrective action including demotion or reassignment of school staff. (EC 52055.57, 20 USC 6316)	0	3	5	6
5.4 LEGAL STANDARD – OPERATIONAL PROCEDURES Personnel files contents are complete and available for inspection. (EC 44031, LC 1198.5)	2	4	5	7
5.5 PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Personnel function nonmanagement staff members have individual desk manuals for all of the personnel functions for which they are held responsible, and the department has a process for cross training.	0	0	2	5
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	3	4	5
5.8 PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Personnel staff members attend training sessions/ workshops to keep abreast of best practices and requirements facing personnel administrators.	0	2	4	6
5.10 PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Established staffing formulas dictate the assignment of personnel to the various sites and programs.	0	2	4	5
7.1 PROFESSIONAL STANDARD – USE OF TECHNOLOGY An online position control system is utilized and is integrated with payroll/financial systems.	0	1	2	5
7.2 PROFESSIONAL STANDARD – USE OF TECHNOLOGY 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)	1	1	1	4

Personnel Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
8.1 LEGAL STANDARD – EVALUATION/DUE PROCESS ASSISTANCE 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.	3	4	6	7
8.3 PROFESSIONAL STANDARD – EVALUATION/DUE PROCESS ASSISTANCE 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.	1	2	4	5
9.2 PROFESSIONAL STANDARD – EMPLOYEE SERVICES The personnel function has developed recognition programs for all employee groups.	0	2	6	7
10.2 PROFESSIONAL STANDARD – EMPLOYER/ EMPLOYEE RELATIONS The personnel function provides a clearly defined process for bargaining with its employee groups that involves site-level administrators.	2	4	5	6
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.	0	2	2	3

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
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	5	6	7
Collective Average Rating		**0.92**	**2.69**	**4.27**	**5.88**

The collective average ratings for all years are based on the subset of priority standards used in this fourth comprehensive review.

Pupil Achievement

1.1   Planning Processes

Legal Standard

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

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Single Plans for Student Achievement (SPSA)

3. Western Association of Schools and Colleges (WASC) accreditation report

4. Local Educational Agency (LEA) Plan

5. Board policies and regulations

6. Title I and economic impact aid (EIA) budgets

7. School site council (SSC) agendas and minutes

Summary of Third Comprehensive Review, March 2012

As of October, 2011, school site councils had been identified but no organizational or planning meetings had taken place for the 2011-2012 school year. The district had notified school site administrators of their categorical budgets, but there was no evidence that school site councils had met to prioritize spending of those budgets. There is was an improvement in the overall framework of the site council process but functionality is was limited, especially at the beginning of the school year.

Summary of Fourth Comprehensive Review, March 2013

School site councils have been created and have had initial meetings and trainings for the 2012-13 school year. The goals and priorities of categorical programs do not necessarily align with SPSAs, the LEA plan, WASC accreditation criteria and other school improvement efforts. Budgets have not been finalized at the sites because the district has not yet disseminated fiscal information.

Findings

1. Documents and interviews with district staff and site councils do not indicate that categorical and compensatory program funds have supplanted other services and materials the district is planning to provide. However, during FCMAT's fieldwork in October 2012, school sites and school site councils had neither received final budgets

from the district nor developed spending plans for categorical funds, making it difficult to determine if supplanting was an issue.

2. Categorical budgeting and program decisions have moved to the school sites in the past three years. Under this structure, school site councils have the potential to control planning and expenditures and review their outcomes when the district provides them with timely budget information.

3. It remains difficult to monitor which services and materials are provided by categorical funding, and there continues to be a lack of alignment of services and materials with the SPSAs, the LEA Plan, WASC accreditation criteria, or other school improvement efforts.

4. At the time of FCMAT's fieldwork, school site councils at both high schools were being formed for the 2012-13 school year, but the site councils had not yet adopted budget expenditures or finalized any categorical fund budgets.

5. There is still no evidence of a districtwide vision or long-term plan for categorical funding and support.

Recommendations for Recovery

The district should:

1. Provide clearly defined categorical budgets for school site councils in a format that parents, staff and community members can easily understand. Ensure that sites and site councils develop and establish budgets before the beginning of school each year.

2. Establish a timeline that identifies deadlines and dates for the following:

   • Categorical budget development

   • Site implementation of categorical support and school site council selections

   • Meeting dates

   • Training dates for school site councils

   • Dates for reviewing data to determine if categorical funding is achieving the desired results

3. Continue to provide school site council members with annual training regarding the purpose and effective practices of a school site council.

4. Ensure that the SPSAs and categorical fiscal resources align with and support the LEA plan and WASC accreditation outcomes.

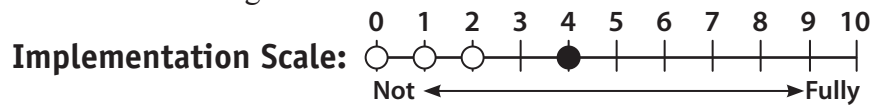## Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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       0  1  2  3  4  5  6  7  8  9  10
       ○──○──○──┼──●──┼──┼──┼──┼──┼──┤
          Not ←──────────────→ Fully
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1.3   Planning Processes

Professional Standard

The LEA's vision, mission, values, and priorities focus on the achievement and needs of all students with the goals of closing the achievement gap and helping all students meet their full potential.

Sources and Documentation

1. Mission/vision statement for the South Monterey County Joint Union High School District

2. Goals for the South Monterey County Joint Union High School District, undated, provided by the district

3. Local Educational Agency (LEA) Plan (addendum) approved by the board on September 14, 2011

4. Interviews with teachers, site administrators and district staff

5. 2012-13 master schedules for King City and Greenfield high schools

Summary of Third Comprehensive Review, March 2012

The district had no clear, simple statement of mission that expressed its primary purpose and that could be shared and repeated by everyone in the district, including students and parents. Existing documents did not make clear that the district takes responsibility for the success of all students and for doing whatever is necessary to ensure student success.

Summary of Fourth Comprehensive Review, March 2013

The district has articulated specific, measurable goals for the 2012-13 school year that address improving the achievement of all students and underperforming subgroups, and has distributed those goals to staff and the community.

Findings

1. The vision and mission statements were revised in the 2011-12 school year by the state administrator and the board of trustees, and are posted on the district's website. The revised statements were distributed to staff. The vision statement does not address closing the achievement gaps that exist in the district (e.g., the gap between English-only students and English learners). However, the state administrator established goals for 2012-13 that address increasing the rate of reclassification to English proficient and identifying and implementing effective intervention strategies for struggling students. The state administrator's goals for 2012-13 were announced at the welcome back to school meeting on August 6, 2012, and postcards with goals were given to each attendee. The cards have

also been distributed to the community and are on display at each school and the district office. Teachers interviewed were familiar with these goals.

Recommendations for Recovery

The district should:

1. Build a shared vision of what it means to meet the needs of all students, including struggling students, and how policies and practices need to change to accomplish this vision.

2. Ensure that its vision and goals expressly include the goal of narrowing the achievement gap between subgroups.

Standard Partially Implemented
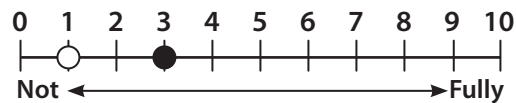
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 3

Implementation Scale:

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1.4   Planning Processes

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.

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Single plans for student achievement (SPSAs)

3. WASC accreditation reports

4. Expected schoolwide learning results (ESLRs)

5. Board policies and administrative regulations

6. 2011and 2012 student achievement data

Summary of Third Comprehensive Review, March 2012

Structural organizational improvements were evident, including a new bell schedule at both high schools, a new certificated staff evaluation system, collaboration days, and an earlier start to the instructional school year. However, communication regarding high expectations for student achievement, implementation of policies, and the need for change were not clear or effective.

Summary of Fourth Comprehensive Review, March 2013

Both high schools have returned to a seven-period-per-day schedule. The use of weekly collaboration time continues and is increasing teachers' use of effective instructional strategies. High expectations for student achievement are not reflected in achievement data, classroom observations or academic outcomes. The new district and site administrators demonstrated a commitment to implementing systemic reform, innovation and high expectations for all students.

Findings

1. The district and site administrators demonstrated a commitment to implementing systemic reform, innovation and high expectations for all students.

2. Both high schools have returned to a seven-period-per-day schedule in an effort to ensure that there is adequate time for credit recovery and interventions for underperforming students during the school day.

3. There continues to be minimal focus on high academic achievement in the schools and limited evidence that a quality education for every student is a high priority for the

district. The number of graduates who have met A-G college entrance requirements for the University of California (UC) and California State University (CSU) systems remains low.

4. There is little evidence of a coordinated and planned instructional program that challenges all students academically, or of district-level attention to providing a challenging educational program.

5. The district and it school sites have embraced and accepted collaboration days. There is evidence of identified expectations, similar trainings being held, and common educational strategies being developed. However, articulation between the two high schools remains limited and inconsistent across content areas.

6. Staff members and departments are making more use of data, and there is evidence that it is beginning to be used to revise educational practices.

7. The effort to develop common benchmarks within subject areas is continuing. The number of departments at both high schools that have academic benchmarks in place is steadily increasing.

8. Recovery efforts for students who fail classes are in place both during school and outside of the school day. The number of recovery classes available is significant.

Recommendations for Recovery

The district should:

1. Use the significant number of reports (WASC, FCMAT, Federal Program Monitoring), plans (LEA, Title III, SPSAs) and abundant student achievement data available to establish common priorities that improve student achievement and focus on learning outcomes.

2. Ensure that changes in policies, expectations, assessment results and program evaluations are clearly communicated to staff verbally and in writing, and that they are easily accessible to staff, parents and the public. Engage teachers, parents and administrative staff in reviewing and developing policies that directly affect the district's core mission.

3. Ensure that policy statements and plans cover both short-term and long-term goals that are aligned with the district's mission statement and that establish an organized, systematic approach to implementing change.

4. Develop and implement a districtwide plan that clearly demonstrates a commitment to systemic reform, innovation and high expectations for all students.

5. Identify and focus on data to establish benchmarks that will help improve student outcomes.

6. Continue to ensure that collaboration plans are coordinated and ongoing, and that they are communicated to all staff. Develop a process to hold departments and instructional staff accountable for outcomes from collaboration time.

7. Continue efforts to develop a districtwide plan to create and implement common assessments in all subject areas.

8. Provide districtwide professional development in using data to influence and shape instruction.

9. Develop plans and strategies to assist low-performing students so that the large number of recovery courses needed can be reduced each school year.

Standard Partially Implemented
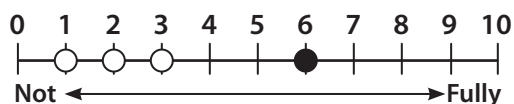
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

Implementation Scale:

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        Not ←————————————→ Fully
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1.5   Planning Processes

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.

Sources and Documentation

1. Board policies

2. District goals for 2012-13

3. Interviews with site and district administrators

4. LEA Plan addendum (2011)

5. Single plans for student achievement (SPSAs)

Summary of Third Comprehensive Review, March 2012

The board had updated policies for student achievement that included statements of fiscal support for improving student achievement. The LEA Plan Addendum and SPSAs provided evidence that board policies were being implemented. The processes for developing the LEA Plan and the SPSAs to date had been focused on compliance. These plans needed to be used as tools to improve student achievement. They needed to be developed in a timely and inclusive manner, funded adequately, shared with all stakeholders, and monitored and revised regularly to ensure effective implementation.

Summary of Fourth Comprehensive Review, March 2013

The district has established student achievement goals and outcomes for 2012-13 and is aligning other site and district plans with the LEA Plan. The district is providing fiscal support for these goals. Improvement has been made in developing and approving SPSAs for the current school year that reflect the district's goals. Site budget development practices do not support the timely implementation of programs and plans that affect student achievement.

Findings

1. The district's Board Policy 6011(a) addresses student achievement outcomes aligned with instructional goals and the need for fiscal support.

2. The LEA Plan addendum approved in September 2011 is being implemented and is being updated to include the district's 2012-13 goals and outcomes for student achievement. The district is providing fiscal support for implementing the goals through professional development, coaching support for teachers and administrators, and ongoing support of

collaboration time for teachers. The goals have been clearly communicated to all staff members.

3. There continues to be a lag in the development of site budgets, department budgets, and site categorical budgets before the beginning of the school year. This continues to create a delay in implementing SPSAs and programs that affect student achievement.

4. Greenfield High School completed a SPSA for 2012-13 with updated student data and goals. The SPSA was reviewed and approved by the SSC. The board approved the Greenfield High School SPSA on October 17, 2012. The district and the SSC are currently finalizing the budget.

5. At the time of fieldwork, King City High School is working with the SSC to complete the SPSA for 2012-13 and planned to submit it to the board for approval at their November 2012 meeting.

Recommendations for Recovery

The district should:

1. Establish a practice of site budget development and management that facilitates program implementation at the start of the school year in order to maximize benefits for students. Allow for adjustments to these budgets when allocations are available, and a change in priorities once student achievement results have been fully analyzed.

2. Continue to monitor the development of SPSAs to ensure the they include the cost of each activity, a funding source, and the person or persons responsible for implementation so that the need for each expenditure is supported by student achievement data and the plan is aligned with the LEA Plan and other site and district plans to improve student achievement.

3. Continue to implement the recommendations made in the March 2012 comprehensive report.

4. Use the information and template provided by the California Department of Education (CDE) (at http://www.cde.ca.gov/nclb/sr/le/documents/leaplantemp.doc) as a guide for the annual revision of the LEA Plan. The template includes a step-by-step process that ensures that all required elements are included and that the plan and expenditures are aligned with the EPCs and supported by student achievement data.

5. Ensure that district and site leadership teams review the LEA Plan each year and have an opportunity to recommend revisions. All staff should be familiar with the required performance goals and the district's plan to meet them. A summary is often used as a way to share the essential information with all staff. The district should work with leadership teams to complete the district assistance survey (DAS) before updating the LEA Plan.

6. Ensure that the SPSAs and LEA Plan not only meet minimum requirements, but also provide information that increases their usefulness and helps unify all plans for

improving student achievement. Ensure that plans are shared with all stakeholders and are posted on the district's and the schools' websites.

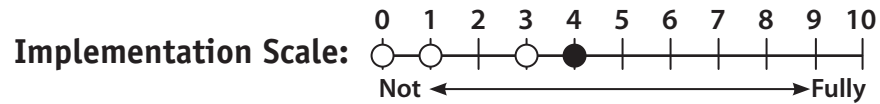## Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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1.6   Planning Processes

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.

Sources and Documentation

1. Board policies

2. School Site Council (SSC) interviews, agendas, minutes, and meeting dates

3. Interviews with site staff

4. LEA Plan

5. SPSAs

6. Collaboration schedules and agendas

7. Interviews with district and site administrators

Summary of Third Comprehensive Review, March 2012

The district had made progress by developing a LEA Plan Addendum that could serve as a foundation in conjunction with the components of a sound instructional program. The district had used the tools and processes recommended for developing the required plans. Next steps were to move beyond compliance to full implementation by making the changes systemic through professional development, monitoring and clear communication of expectations.

Summary of Fourth Comprehensive Review, March 2013

The board has policies and an LEA plan with goals and outcomes that will support the implementation of a sound instructional program. There is a districtwide effort to align all student achievement plans. New district and site administrators have the knowledge and skills necessary to implement the LEA Plan and SPSAs successfully. The district's most recent activities and priorities clearly indicate a commitment to full implementation of policies and plans for improving student achievement.

Findings

1. The district has policies that broadly address this standard and continues to progress toward fully implementing these policies. The policies are reflected in the details of the LEA Plan and the SPSA for each school site.

2. District and site administrators have the skills and knowledge to lead the district toward full implementation of an instructional program that will improve student achievement. Teachers and support staff also have the knowledge and skills to meet the goals and outcomes administrators have outlined and clearly communicated. There is widespread support among district and site staff, parents and the board for the changes that have been made and the goals that have been set.

3. The LEA Plan addendum, approved in September 2011, addresses the fundamental components of a sound instructional program. The LEA Plan is being revised to reflect current goals, outcomes, and updated student achievement data. There is a district-level effort to ensure alignment of all student achievement plans including Title III, professional development plans, WASC and others.

4. School site councils (SSCs) met several times during the 2011-12 school year but attendance was low, especially among parent members of the council. SSC meeting dates have been set for 2012-13.

5. SSC agendas and minutes show that the SSCs have been involved in reviewing plans, making recommendations and approving the plans. The SSCs received training as required by both board policy and state regulations.

6. SSC members indicated that communication with the school site regarding their role and duties has improved. Administrators are listening to and acting on their input. The SSCs would like to have agendas prior to meetings and consistent accommodations for limited- and non-English speakers.

7. Site and district administrators are providing clear direction for and consistent monitoring of weekly collaboration time. Collaboration time is structured, agendas are provided or required, and minutes are reported. The time is focused primarily on student achievement. Agendas are not often provided in advance, and administrators do not provide feedback on the minutes of the meetings.

Recommendations for Recovery

The district should:

1. Ensure that school site leaders and their staff have the support and resources needed to successfully implement the district's plans and goals.

2. Because SPSAs need to be developed as working documents that can be monitored, include specific timelines and budget allocations for each activity, and assign a person responsibility for implementing the activity. Regularly include on each SSC's agenda a review of progress in implementing the SPSA.

3. Continue to provide professional development for all staff in the analysis of student achievement data and the use of the Academic Program Survey (APS) so that staff can participate in the development of the SPSAs and implement the plans effectively.

4. Continue efforts to establish and convene SSCs in spring for the following year to facilitate implementation of SPSAs at the start of the school year. Ensure that the number of SSC meetings is adequate to effectively monitor progress in implementing the SPSA.

5. Make every effort to meet the needs of parent SSC members to improve their attendance and active participation. Provide agendas prior to meetings, and ensure that accommodations for limited- and non-English speakers are consistent.

6. Continue to provide direction for and monitor collaboration time to ensure that the focus is on student achievement. Provide agendas in time for teachers to prepare for weekly meetings and give feedback on the minutes to provide support for the work done during this time.
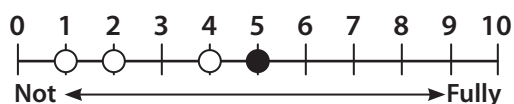
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

1.8   Planning Processes

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.

Sources and Documentation

1. Interviews with classified staff, teachers, site administrators and district staff

2. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

3. District technology plan for July 1, 2010 through June 30, 2013

4. Sample assessments

Summary of Third Comprehensive Review, March 2012

The district had made progress in providing access to student achievement data through the use of SChoolPlan. They had also provided adequate time for teachers to review and analyze data through weekly collaboration time. The district had not provided professional development on the use of data analysis results or the appropriate use of the collaboration time.

Summary of Fourth Comprehensive Review, March 2013

The district continues to make progress in analyzing and using data to inform improvements. Despite training, some teachers struggle to use SChoolPlan effectively to analyze student data, and the district is considering adopting a more user-friendly data analysis tool. Teachers reported that they analyze data individually and collaboratively and use the results to improve instruction. Teachers continue using departmental collaboration time to refine benchmark assessments when needed, but the focus of collaboration time has evolved to using assessment results. Teachers have been trained in Constructing Meaning (a research-based program designed to improve instruction for English learners) strategies and understand the district's expectation that they use these strategies and the results of classroom observations to improve instruction, with a focus on English learners. Implementation of these improvements is in the early stages. The district is making some progress in using data to place students in classes.

Findings

1. The district continues to use the Aeries student information system to store student enrollment and demographic information. The district convened an Aeries support team meeting on October 3, 2012 to facilitate sharing of updates and practices among staff who use Aeries. District and site staff indicated they use and rely on the data stored in Aeries.

2. Teachers continue to have access to SChoolPlan, and some teachers use it to analyze student data. Other teachers reported using Microsoft Excel or other methods to analyze

student data. Problems with the master schedule delayed getting the correct rosters in SChoolPlan. As a result, some teachers used other methods for data analysis because not all of their students were included in their classes in SChoolPlan early in the school year when they wanted to use the program for data analysis. This issue was resolve by the time of FCMAT's review. Teachers and the district staff reported the district is discussing replacing SChoolPlan because some teachers continue to have difficulty using it. However, even with the dissatisfaction with SChoolPlan, district and site staff indicated that analysis of student assessment data has become standard practice.

3. Teachers continue to use collaboration time to analyze student data and plan improvements. Teachers have been trained in Constructing Meaning strategies that are designed to improve achievement for English learners. Some teachers indicated that they have begun to use these strategies in their classrooms while others indicated they need more time to learn the strategies before they become part of their classroom practice. FCMAT observed only limited use of these strategies during fieldwork.

4. Teachers reported that they have more structure for collaboration time this year, with one meeting per month spent in interdisciplinary teams, one spent in department teams, one devoted to WASC preparation, and one focused on school committees. During this review the interdisciplinary teams were observing in each other's classrooms to learn how other teachers were implementing Constructing Meaning techniques. The teachers who had completed these observations indicated that they helped reinforce the training received and gave them ideas for how they can incorporate the strategies into their teaching. More in-depth classroom observations were planned for the coming months.

5. The district has hired coaches for the principals, vice principals and teachers. Coaches will help teachers improve classroom practice and fully implement Constructing Meaning. Principals and teachers indicated that the coaches were helpful.

6. District staff and teachers indicated that the district continues to use the results of state assessments to place students in classes; however, teachers reported that teacher recommendations and class grades are sometimes used when placing students.

Recommendations for Recovery

The district should:

1. Continue to support a team of district and site staff to build a common understanding of what it means to use data effectively. Provide professional development on the effective use of disaggregated data, as well as ongoing coaching, to ensure that changes in teaching practice are implemented and refined over time.

   In addition, ensure that the team visits high-achieving school districts to gain a broader perspective on how data can be used to influence and shape improvements and the specific strategies used by these districts to achieve positive results. These visits should not be isolated efforts by individual teachers; rather, they should be part of a coordinated effort to build a common understanding of best practices in the effective use of data. Participating in the Professional Learning Communities at Work Institute or similar

professional development will also help the district build a common understanding of how to better meet all students' needs and how to implement and sustain improvements.

2. Continue engaging teachers in using collaboration time to analyze disaggregated data and identify areas in which additional strategies are needed to narrow the district's achievement gaps and improve student achievement. Encourage teachers with better results to share strategies with other teachers and/or provide additional professional development on these strategies. Provide coaching and support to help teachers use collaboration time.

3. Continue to provide teachers and administrators with professional development training in the appropriate use of data and analysis for improving teaching and learning. This training needs to be part of a comprehensive package of staff development so that the results of the analysis can be applied in the classroom effectively and in a timely manner.

4. Continue to set clear expectations and a structure for the use of collaboration time. Have site administrators regularly monitor the use of collaboration time. Offer support where needed to ensure that this investment of time makes a significant positive difference in student achievement.

Standard Partially Implemented

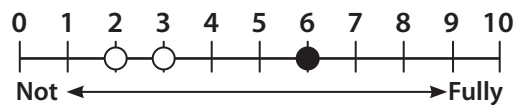February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        ├──┼──○──○──┼──┼──●──┼──┼──┼──┤
        Not ◄─────────────────►Fully
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1.9   Planning Processes

Professional Standard

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

Sources and Documentation

1. Interviews with teachers, site administrators, district staff and students

2. Board policies

3. Collective bargaining agreements

4. Evaluation and observation forms

5. Greenfield High School Single Plan for Student Achievement, dated October 17, 2012

6. King City High School Single Plan for Student Achievement, dated November 11, 2011

7. South Monterey County Joint Union High School District 2012-13 certificated evaluation schedule

8. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

Summary of Third Comprehensive Review, March 2012

The district was implementing an evaluation system for teachers that is based on the California Standards for the Teaching Profession. A similar process was not in place for administrators. The district provided professional development through weekly collaboration time and outside providers, but there was no process for holding teachers and administrators accountable for implementing what was learned, and no system to determine which elements were making a difference in student achievement.

Summary of Fourth Comprehensive Review, March 2013

The district has implemented a revised evaluation system for teachers, and teachers report that their evaluations have been completed on time. The district has established expectations for administrators and is providing coaches for principals and vice principals to help them meet expectations. A standard walk-through protocol has been developed and is in use. Teachers have received professional development in Constructing Meaning strategies for English learners, and the district has hired coaches to help teachers incorporate these strategies into their instructional practices.

Findings

1. The district has implemented a revised teacher evaluation process, and teachers report that their evaluations are completed on time.

2. Teachers have been trained in Constructing Meaning strategies for English learners, and coaches are available to help teachers learn to incorporate the strategies into their classroom instruction. Teachers are being held accountable for using these strategies in their classrooms through administrators' visits to classrooms (known as walkthroughs) and peer observations. Following a walkthrough, administrators provide some form of feedback to the teacher. Teachers and administrators report that teachers are in the early stages of implementing Constructing Meaning strategies. Some teachers are using the strategies, but others indicated that they have not yet begun to use the strategies in their classroom. Administrators indicated that they expect to see more incorporation of the strategies later in the year and will hold teachers accountable for this progress. Teachers reported that they are observing their peers' implementation of the strategies and are finding these observations helpful.

3. The district provided training for teachers and administrators in the development of professional learning communities. These concepts are in the early stages of development through collaboration time.

4. The district has hired coaches for the principals and vice principals of the comprehensive high schools to assist with all aspects of leadership. The principals reported that they were finding the coaching helpful.

5. The district staff reported that they are holding the site administrators responsible for providing more structure for teacher collaboration time this year. Principals understood this expectation and were providing this structure for teachers. Most teachers interviewed indicated that collaboration time was more productive this year.

6. The district is also holding administrators accountable for using a standard process for regularly conducted classroom observations. Principals clearly understood this expectation and were using the district-adopted observation protocol during their classroom walkthroughs. The protocol forms are submitted to the district after the walkthroughs, and the district office uses these forms to monitor whether the site administrators are meeting the district's expectations.

7. Both comprehensive high schools will be reviewed by the Western Association of Schools and Colleges (WASC) this school year. The district is holding administrators accountable for engaging the site staff in the WASC self-study. The principals are using one collaboration day per month to have the staff work in teams to prepare for the WASC review. Teachers reported that they are engaged in this process.

8. The state administrator set specific, measurable goals for the school year and is holding staff accountable for progress toward these goals. Site administrators and teachers were familiar with the goals and understand their role in making progress toward accomplishing them. The district and site staff interviewed expressed more commitment

to and engagement in improvement than was observed during previous reviews. However, FCMAT did not observe Constructing Meaning strategies being used in the majority of classrooms visited.

9. Administrators and teachers indicated that annual turnover of school site administrators has affected each site's ability to make and sustain improvements. Principals, teachers and district administrators acknowledged that the district is making progress this year and expressed hope that this can be sustained.

Recommendations for Recovery

The district should:

1. Continue to support the growth and quality of professional learning communities as a vehicle for addressing students' learning needs and effectively implementing the professional development that has been provided by the district.

2. Continue to implement the new evaluation process for teachers, and develop a similar process to hold administrators accountable for student achievement.

3. Continue to provide training and support for new administrators to ensure a common understanding of how to conduct classroom observations. Provide a specific focus for administrators for classroom visits, based on the professional development teachers are receiving.

4. Analyze student outcome data and classroom observation data to determine which teachers need additional support. Provide additional professional development and coaching to teachers whose students consistently receive lower grades and/or assessment results.

5. Continue to hold site administrators accountable for developing and using single site plans that include specific, measurable student-focused goals aligned with the LEA Plan and the district's goals and priorities. Hold teachers and site administrators accountable for developing and implementing intervention strategies when school sites' goals are not being met.

Standard Partially Implemented

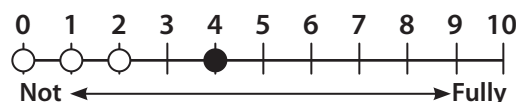February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        ○──○──○──┼──●──┼──┼──┼──┼──┼──┤
          Not ◄───────────────► Fully
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2.1   Curriculum

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)

Sources and Documentation

1. Classroom observations

2. Classroom observation tools

3. Instructional materials resolution 2012-13

4. Textbook inventory

5. Interviews with teachers, support staff and site administrators

6. Interviews with district administrators and staff

Summary of Third Comprehensive Review, March 2012

The district had purchased the appropriate instructional materials and students had access to these materials. Consistent use of materials was needed to fully address the content standards for all students, but there was no evidence that the materials approved by the board were used consistently by all teachers. To ensure the full benefit for students, the district needed to train teachers and monitor implementation of the training.

Summary of Fourth Comprehensive Review, March 2013

The district has appropriate and sufficient instructional materials for all students in all content areas. There was no indication that the appropriate and consistent use of these materials is monitored. Training for teachers and administrators using a set of instructional materials for the first time is essential if students are to fully benefit from their use.

Findings

1. The district continues to provide standards-aligned instructional materials, including intervention materials, for districtwide use.

2. The state administrator and the board approved the district sufficiency resolution. The board resolution indicated no insufficiencies in instructional materials.

3. The Williams review found that there is a sufficiency of instructional materials in the district.

4. FCMAT observed textbooks and appropriate supplemental materials being used by students in some classrooms. However, there is no indication that the consistent and appropriate use of board-approved instructional materials is monitored.

5. There was no evidence that teachers and administrators who are using instructional materials for the first time received training in full implementation of the materials.

Recommendations for Recovery

The district should:

1. Develop and implement a districtwide process for monitoring the use of instructional materials selected for use in specific courses and for their full implementation. Hold teachers accountable for the use of assigned materials. Ensure that instructional materials use is included in the protocols for classroom visits. Administrators should participate in the same instructional materials training as the teachers to understand what full implementation looks like.

2. Ensure that all teachers, coaches and administrators who are using instructional materials for the first time participate in instructional materials training for their content area. Experienced teachers and coaches could provide this training.

3. Continue to conduct an annual inventory of instructional materials to ensure that all students have the appropriate materials in sufficient numbers.

Standard Partially Implemented

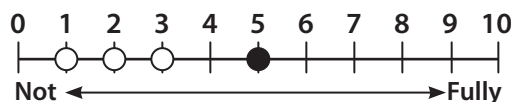February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 5

Implementation Scale:

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        |──○──○──○──|──●──|──|──|──|──|
         Not ◄──────────────────► Fully
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2.3   Curriculum

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.

Sources and Documentation

1. LEA Plan

2. SPSA for each school site

3. Title III plan

4. Collaboration time agendas

5. Interviews with teachers and site administrators

6. District mission, vision, and goal statements

7. Classroom walkthroughs

Summary of Third Comprehensive Review, March 2012

The district had updated and completed the required plans that outlined the academic program, but plan development continued to focus on compliance and needed to move toward quality implementation. Many curricular elements were in place and the knowledge and energy to carry out the work had increased. Planning and procedures needed to be more collaborative and more closely aligned with achievement results and goals for all students.

Summary of Fourth Comprehensive Review, March 2013

The state administrator has set clear goals for improving student achievement and is receiving support from the staff in implementing those goals. There are efforts to ensure that all plans are aligned. There is greater focus on teaching and learning, and on everyone's role in improving student achievement. Collaboration time is being used constructively and is focused on student achievement. Professional development is focused on district plans and goals.

Findings

1. The LEA Plan is being used to provide direction for close alignment of curriculum, instruction and assessment based on standards, frameworks and standards-aligned instructional materials. It is being updated to include the district's goals for 2012-13.

2. District and site administrators have the skills and knowledge to lead the district toward full implementation of an instructional program that will improve student achievement.

Teachers and support staff also have the knowledge and skills to meet the goals and outcomes administrators have outlined and clearly communicated. There is widespread support among district and site staff, parents and board members for the changes that have been made and the goals that have been set.

3. Site administrators and teachers have attended training regarding the common core standards and are planning for implementation.

4. The district is working to ensure that all district and site plans (LEA, SPSA, Title III, professional development, WASC) are aligned. The district is working to develop one plan to improve the programs offered to English learners.

5. The collaboration time provided by the district is being used more effectively to support alignment efforts by providing opportunities for teachers to make connections across programs and content areas. Some concerns were expressed that the opportunities for departments to meet has been reduced. Staff find it difficult to achieve continuity when they only meet as departments once every four weeks.

6. The professional development that the district has provided supports the district's plans and goals. Training in *Constructing Meaning, A Focused Approach: Instruction for English Learners* has been provided for all teachers and was accomplished using district-certified trainers. There is evidence that some teachers are implementing these strategies in their classrooms. Others indicated that they wanted more time. The district has developed a walkthrough protocol for use in monitoring implementation. Academic coaches support teachers in implementing the Constructing Meaning strategies.

Recommendations for Recovery

The district should:

1. Ensure that a plan to better serve English learners includes alignment with the LEA Plan, the SPSAs, professional development plans, economic impact aid (EIA), Title I, and Title III requirements. Continue to support and fully implement Constructing Meaning.

2. Continue to structure and monitor collaboration time. Increase communication regarding the current structure of collaboration time and the connections between department concerns, interdepartmental issues and WASC requirements.

3. Continue efforts to develop a single, cohesive and clearly understood districtwide plan for improving student achievement. Ensure that the plan includes timelines, funding sources and persons responsible. Monitor progress to ensure that all parties are held accountable for following the plan and meeting its goals. Check all district and site plans (LEA, SPSA, Title III, professional development, WASC and others) for alignment. Although many of these plans are mandated, complex and have specific requirements, communicate to all interested and involved parties one plan for improving student achievement through the district's mission statement, goals and actions.

4. Continue to use state tools such as the following to assess schools' and the district's structures and supports for strong instructional programs:

    •   Academic Program Survey (APS), for schools

    •   District Assistance Survey (DAS), for district use

    •   English Learner Subgroup Self Assessment (ELSSA), for district use

    •   Inventory of Services and Supports (ISS), a district tool for support of students with disabilities.

5. Ensure that district and site leadership teams (teachers, administrators, parents and other staff) and school site councils meet at least quarterly to monitor implementation of the LEA Plan and the SPSAs.

6. Work to ensure that the LEA Plan and the SPSAs are developed using a collaborative process that includes administrators, teachers, parents, other appropriate staff, and students.

7. Continue to use the increasing knowledge and energy of the staff to implement district plans. Involve staff in data analysis, plan development and plan monitoring to better achieve a cohesive and clearly understood districtwide plan for improving student achievement.

Standard Partially Implemented
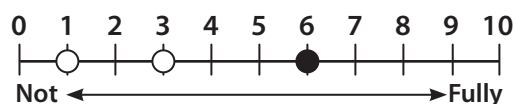
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 6

Implementation Scale:

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        0   1   2   3   4   5   6   7   8   9  10
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2.4   Curriculum

Professional Standard

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

Sources and Documentation

1. Interviews with administrators and teachers

2. Professional Learning Community (PLC) schedules

3. Student achievement results (state and local)

4. Selected benchmark assessments from each school site

5. Collaboration meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

The district was producing and collecting student achievement data, but how the data is used was not common knowledge districtwide. District leaders needed to communicate clearly to define a comprehensive assessment system and its policies and practices. More professional development on the analysis of and use of data for improving teaching and learning was needed.

Summary of Fourth Comprehensive Review, March 2013

The district has made some progress in using student achievement data to assess progress in improving student achievement. The districtwide system of data collection, common assessments, and the use of data to inform teaching and learning is not fully developed or implemented. Teachers do not have all the necessary information to modify instruction for students, especially English learners. There has been significant improvement in the use of collaboration time, which would be enhanced by a districtwide assessment system.

Findings

1. There is evidence of the use of common assessments when they have been completed for a content area or a specific course. The district lacks a complete set of common assessments for all core content areas for use districtwide.

2. Although training has been provided, SChoolPlan software for data management is not being used consistently schoolwide or districtwide. There is evidence that not all class rosters are being posted in a timely way, restricting effective use of the system.

3. Collaboration time is structured and monitored. Agendas are provided and minutes reported. The time is used on a rotating basis for department professional

learning communities (PLCs), interdisciplinary PLCs, school committee meetings, and focus on learning PLCs.

4. There continues to be a heavy reliance on state assessment data, primarily the California Standards Tests (CSTs), California High School Exit Exam (CAHSEE), and California English Language Development Test (CELDT) for individual student placement. The district also uses teacher recommendations for student placement when needed.

5. There is a greater awareness of student achievement data. There is evidence that collaborative groups use benchmark data when it is available to guide conversations about improving student achievement.

6. CELDT language levels are not provided to all teachers so that instruction can be modified for the different levels of language proficiency.

7. The district continues to provide support for students who have not passed the CAHSEE.

8. Reports on graduation rates and A-G requirements completion rates are not commonly shared with teachers.

Recommendations for Recovery

The district should:

1. Accelerate the development of a districtwide system of assessments and data collection that can be easily shared to effectively shape and influence teaching and learning. Include all data that provides information about the best placement and method of instruction for a student (CAHSEE, CELDT level, common local assessments, CSTs, A-G completion and others).

Continue efforts to implement the following recommendations provided for this standard in the first and second comprehensive review reports.

2. Develop and implement a district policy and a set of practices that requires the regular collection and analysis of common formative and summative assessment data to establish instructional priorities and shape classroom instruction.

3. Ensure that the common formative and summative assessments being developed are districtwide by course, based on identified essential content standards for each course, and administered using an agreed upon pacing guide or calendar.

4. Ensure that all common assessments are loaded into the SChoolPlan system for easy disaggregation of data and analysis. Class rosters should be posted on SChoolPlan prior to the first administration of common assessments.

5. Ensure that the results of the common assessments are analyzed by collaborative teams of teachers and used to improve instruction for all students.

6. Use one system of data management (currently SChoolPlan) for recording and accessing student achievement data from both state and local assessments (formative and summative). Ensure that every teacher and administrator has access to this system and is held accountable for using it.

7. Continue to use multiple sources of data to determine the placement of students in courses and/or interventions. The CST data is not reliable at the individual student level and should not be used as a sole source for determining a student's instructional level or course placement.

8. Continue to ensure that CAHSEE results are analyzed and that the results of the analysis are used to provide targeted assistance based on a student's proficiency level.

9. Continue to structure collaboration time so that it is clear that the goal is for teachers to work together to analyze assessment results and student work, and to use this information to improve their instruction. Monitor collaboration time to ensure that teachers are conducting activities that will improve instruction and student learning.

Standard Partially Implemented

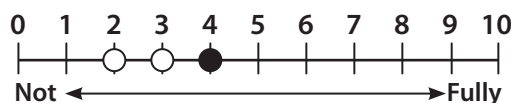February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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         0  1  2  3  4  5  6  7  8  9  10
         ├──┼──○──○──●──┼──┼──┼──┼──┼──┤
         Not ◀─────────────────────▶ Fully
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2.5   Curriculum

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.

Sources and Documentation

1. District technology plan for July 1, 2010 through June 30, 2013

2. Interviews with teachers, site administrators and district staff

Summary of Third Comprehensive Review, March 2012

The district was implementing its technology plan, and teachers' use of technology had improved and increased. More attention needed to be given to students' use of technology in classrooms to make full use of Smart Boards and internet access.

Summary of Fourth Comprehensive Review, March 2013

Teachers continue to use overhead projectors and white boards when available during direct instruction. Students' use of technology in the classrooms continues to be somewhat limited and is used mostly for research and writing assignments.

Findings

1. FCMAT observed teachers' use of technology for instruction but saw only minimal student use of technology in classrooms at the comprehensive high schools. Technology is used for credit recovery at the comprehensive high schools as well as at the alternative site, and students also use technology for research and writing assignments. The district is working to address connectivity issues at the alternative sites.

2. The district has an approved technology plan that is linked to improving student achievement. The plan expires at the end of the 2012-13 school year and it was unclear how broadly input will be sought when updating the plan. Updating the technology plan provides the district with an opportunity to obtain feedback and support from teachers and the community regarding increased student use of technology in the classroom.

3. Several teachers expressed an interest in helping revise the technology plan to improve student use for learning and to prepare for the assessment of common core standards.

Recommendations for Recovery

The district should:

1. Use the interest expressed by several teachers in participating in the revision of the technology plan to develop a plan that will create more opportunities for students to use technology for learning.

2. Establish common expectations regarding teachers' use of technology as a tool in teaching and learning, and provide the professional development and support teachers need to implement the district's technology plan.

3. Form site and district technology committees, and use these committees to help revise the technology plan.

4. Ensure that alternative education sites have Internet access that will address the needs of these programs.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

3.1 Instructional Strategies

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)

Sources and Documentation

1. Academic Progress Report (APR) 2011-2012

2. CELDT results for 2011-12

3. California Standards Test (CST) and CAHSEE results for 2011-12

4. Interviews with teachers, administrators and instructional aides

5. Classroom observations

6. Title III Plan

7. Consolidated Application

8. Federal Program Monitoring (FPM) schedule and results

Summary of Third Comprehensive Review, March 2012

The achievement levels of the district's English learners remained far below those of the rest of the student population. Significant numbers of students scored in the below basic and far below basic categories on standardized tests. There continued to be no observable difference in instruction between regular grade level classes and ELD and SDAIE classes. Strategies designed to help English learners acquire English while accessing content were not being used regularly. Significant attention needed to be given to providing appropriate instruction for English learners. The Special Education Review report and action plan had put the district on the path toward improving the results for special education students. Similar actions needed to be taken for English learners.

Summary of Fourth Comprehensive Review, March 2013

The district is actively addressing the learning gap among English learners and has plans for continuing this work during the 2012-13 school year. The district has restructured special education programs to include more mainstreaming. There is evidence that training in Constructing Meaning and professional learning communities is beginning to be implemented. Student achievement scores declined for all subgroups, and there is still a significant gap for English learners. Staff, parents, and students expressed concern regarding the placement of

students in English language development (ELD) and specially designed academic instruction in English (SDAIE) classes.

Findings

1. The district is actively addressing the learning gap that exists for English learners and plans to work with experts in instructional programs for English learners to evaluate its current program and make the changes necessary to ensure success for EL students. There is discussion about working in collaboration with feeder districts on this effort.

2. The district has completed training for all teachers in Constructing Meaning, which is a research-based program designed to help teachers incorporate academic language instruction into their content area instruction for secondary English learners. The district is beginning to implement the program, and there is evidence that some teachers are beginning to use these strategies. The use of a language objective was only evident in a few classrooms.

3. Teachers and administrators participated in the professional learning community (PLC) training provided by the district and are actively involved in the PLC work taking place during collaboration time every Wednesday.

4. FCMAT observed 34 classrooms, and found that eight of the 10 EL strategies on the observation protocol were used by three or more teachers. This is a significant increase from the previous review and is attributed to the Constructing Meaning training, walkthrough monitoring, and coaching.

5. Both the district English learners advisory committee (DELAC) and the English learner advisory committee (ELAC) are operational and have received training.

6. The district's 2012 state testing results show a decline in CST scores districtwide for all subgroups. The decline in the percentage of students scoring at proficient or above ranged from 10 to 19 points in English language arts and from 5 to 18 points in math. At the same time, the state targets are increasing. Although all subgroups declined in their CST scores, there continues to be a significant gap for EL students and students with disabilities.

    *   King City High School:
        Schoolwide, 40% of ninth grade students, 40% of tenth grade students, and 46% of eleventh grade students scored at proficient or above on the English language arts CST. However, among English learners, 3% of ninth grade students, 2% of tenth grade students, and 4% of eleventh grade students scored at proficient or above. Similar gaps occurred in mathematics. Of the 77 students who took the Algebra II test, 48% of tenth grade students and 30% of eleventh grade students scored proficient or above. In the same school and course, two English learners took the same test and did not score at proficient or above.

    *   Greenfield High School:
        Schoolwide, 36% of ninth grade students, 33% of tenth grade students and 38% of eleventh grade students scored at proficient or above on the English language arts

CST. In the same content area, among English learners, 7% of ninth grade students, 0% of tenth grade students, and 5% of eleventh grade students scored at proficient or above. Similar gaps existed in mathematics. Of the 78 students who took the Algebra II test, 30% of tenth grade students and 7% of eleventh grade students scored at proficient or above. In the same school and course, five English learners (one tenth grader and four eleventh graders) took the test and none scored at proficient or above.

- In 2011, of the 497 students in the district who took the Algebra I CST, 286 (58%) scored below basic or far below basic. Of the 189 English learners who took the Algebra I CST, 146 (77%) scored below basic or far below basic. Algebra is a graduation requirement for every student.

7. FCMAT observed seven ELD and SDAIE classrooms, and in two of the classrooms differentiation for the various language levels was observed. In only two of these classes did students have structured opportunities to speak.

8. Parents, staff members and students expressed concerns regarding the placement of EL students and the persistent placement in ELD and SDAIE classes for many of these students. CELDT results show little progress beyond language level three for a large number of EL students.

9. Special education teachers are co-teaching at both school sites with aide support to better accommodate mainstreamed special education students. Both special and regular education teachers were positive about using this method.

Recommendations for Recovery

The district should:

1. Provide training in Constructing Meaning for instructional aides who work with students who are mainstreamed so that they can better support teachers in implementing these strategies.

2. Continue to support the professional learning community (PLC) professional development that was provided for teachers and administrators by the district. When resources are available, send a small team from each site to the Professional Learning Communities at Work Institute. This will help increase the leadership capacity at the sites to support the progress the district is making in this area and to help ensure that every student meets the standards and succeeds at high levels.

3. Continue to provide teachers, administrators and instructional aides with support to maximize the benefits of mainstreaming for special education students. Monitor and support special education teachers and regular classroom teachers in implementing co-teaching. Continue to support the full implementation of the May 2011 Special Education Review report and corresponding action plan.

4. Continue to provide teachers with training and support in differentiating instructional strategies to target the needs of EL students, students with disabilities and students

assigned to intervention classes. Continue to closely monitor the implementation of these strategies.

5. Continue to provide training and support for all teachers in strategies such as Constructing Meaning and SDAIE that provide access to course content while a student is learning English. Promote the understanding that in a high school with significant numbers of English learners every teacher is responsible for using these strategies when any English learners are present in their classrooms.

6. Continue to hold teachers accountable for using instructional strategies that will help them be more successful in teaching EL and special education students. Continue to hold administrators accountable for monitoring the use of strategies in the classroom, encouraging and supporting teachers as they learn to use them. Encourage input from teachers to identify any additional support that might be needed for successful implementation. Ensure that PLC time includes time for teachers to share effective strategies and help each other solve any problems with implementation.

7. See also the related recommendations in Standard 3.17.

Standard Partially Implemented
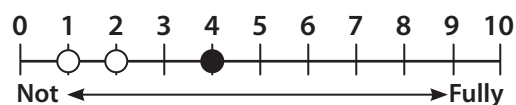
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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      Not ◄─────────────────► Fully
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3.6 Instructional Strategies

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).

Sources and Documentation

1. Interviews with district and site administration, teachers, support staff, parents and students

2. Single Plan for Student Achievement (SPSA) for each site

3. WASC accreditation reports

4. A-G requirement completion reports

5. Board policies and regulations

6. Student registration material and course descriptions

Summary of Third Comprehensive Review, March 2012

Alignment of courses was still being discussed. There was no clearly communicated plan for students who needed to retake a required course for graduation that they previously failed. Significant work had improved the course offerings in agriculture, but course offerings in other elective areas remained minimal.

Summary of Fourth Comprehensive Review, March 2013

Credit recovery courses are in place for students during and outside of the school day. With the implementation of a seven-period day at both comprehensive high schools, the potential exists for additional elective course offerings. There has been little change in the number of graduates completing A-G course requirements.

Findings

1. Discussions and planning continue regarding the alignment of courses between the two high schools, within departments and with the state content standards.

2. Credit recovery opportunities for students who are attempting to make up a failed course are now in place. The majority of the make-up efforts are online during the school day, after school and on some Saturdays. Because the program is in its initial stages, it is too soon to determine its success or the need for any adjustments.

3. Elective courses at both comprehensive high schools have increased with the implementation of a seven-period day. However, because of the large number of students who need credit recovery courses, the number of electives added is limited.

4. Advanced Placement (AP) classes are offered at both comprehensive high schools, but there is a wide variation between the two schools in teaching strategies and in AP exam results.

5. The district reinstated counseling positions this school year. There is now one counselor at each of the high schools.

Recommendations for Recovery

The district should:

1. Continue to ensure that course offerings at the two comprehensive high schools are similar, and offer courses that prepare more students to enter the California State University or University of California system after graduation.

2. Conduct a periodic survey of students and an assessment of outcomes to determine the helpfulness of the counseling services for career and college decisions.

3. Create a study group to review the causes of ongoing low A-G course requirement completion, and develop districtwide strategies to address the issue. Provide teachers with A-G course completion results.

Standard Partially Implemented
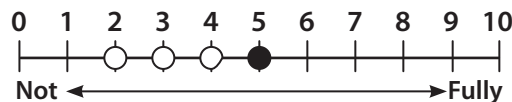
February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

Implementation Scale:

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3.7   Instructional Strategies

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)

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Single plans for student achievement

3. WASC accreditation report

4. Board policies and regulations

5. Classroom observations

Summary of Third Comprehensive Review, March 2012

Significant organizational improvements had been made in the district's alternative education program. There was a clear purpose, vision, and plan for further implementation of strategies in this area.

Summary of Fourth Comprehensive Review, March 2013

Efforts in alternative education have remained constant and have stabilized. The district continues to develop and implement procedures and policies for special education.

Findings

1. The alternative education program has stabilized for the second consecutive year. There are continuation high schools at both the Greenfield and King City comprehensive high school campuses. They are running at full capacity and have substantial waiting lists. The district continues to systematically address findings and recommendations regarding alternative education provided in previous FCMAT reviews.

2. The alternative education administrator's duties have been expanded to include the administration of educational services for the entire district. Many of the day-to-day operations of alternative education are being monitored by a teacher in charge.

3. A part-time special education coordinator, in their second year, oversees special education processes, procedures and organizational structure. The coordinator continues to address the findings in the May 2011 Special Education Review.

Recommendations for Recovery

The district should:

1. Address the significant number of students waiting to enroll in alternative education, including making an effort to determine the reason for the high number of students requesting alternative education and identifying solutions to reduce future waiting lists.

2. Implement and follow accountability components to ensure that alternative education programs teach all curricula and meet the same standards as the courses taught in the comprehensive high schools.

3. Further establish standard districtwide policies for alternative education enrollment and procedures for qualified students to return to a comprehensive high school after being successful in alternative education.

4. Develop and implement a long-term plan for consistent administrative coverage of alternative education.

5. Implement the recommendation in the May 2011 Special Education Review report to review district policy for certificates of completion. If need, develop a new policy or amend the current policy so that students can receive a certificate of completion when they complete a modified course of study and are assessed using the California alternative performance assessment (CAPA).

Standard Partially Implemented

February 2010 Initial Rating: 2
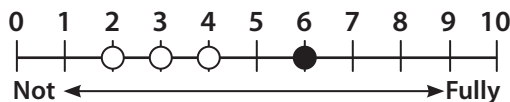
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

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      0   1   2   3   4   5   6   7   8   9  10
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       Not ◄─────────────────────────► Fully
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3.10　Instructional Strategies

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)

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Board policies and regulations

Summary of Third Comprehensive Review, March 2012

A structure was being developed for the many processes, regulations, and procedures related to special education. The special education coordinator was making steady progress in aligning the special education program with the recommendations contained in the Special Education Review, May 2011.

Summary of Fourth Comprehensive Review, March 2013

Progress continues in establishing regulations and policies in special education. However, progress is slowed by deficiencies in the special education department's chain of command. Regular education teachers' participation in IEP meetings is not sufficient to meet special education requirements.

Findings

1. There are some deficiencies in the special education department's chain of command. Specifically, communication, accountability and follow-through are lacking, and this is slowing the progress that the department and students have made over the last two years.

2. The district continues to update its board policies related to special education.

3. The district employs a part-time special education coordinator to oversee special education processes, procedures and organizational structure. The coordinator and special education staff are working to systematically address the findings in the May 2011 Special Education Review, which agree with the findings and recommendations in this report. Some of the tasks include refining the districtwide system for referring students for special education, reestablishing the chain of command and accountability for special education instructional programs, and providing appropriate training for regular education teachers of mainstreamed special education students.

4. The district holds a transitional IEP meeting when a student moves into the district or enters a high school from a feeder elementary school district.

5. IEP meetings are still not fully attended by regular education staff as required.

6. The district does not regularly review special education teacher caseloads and IEPs to determine which students can be served using a 504 plan.

Recommendations for Recovery

The district should:

Continue addressing the following recommendations that were provided in the March 2011 comprehensive review report.

1. Establish a clear administrative chain of command that provides accountability, communication and follow-through for special education programs, classes, and students with active IEPs.

2. Continue to keep all board policies related to planning and implementation of special education programs and services updated, including the identification, screening, referral, assessment, review, and triennial assessment of students with special needs.

3. Consult with special education local plan area (SELPA) program specialists for guidance when developing policies and procedures to deliver resource specialist programs (RSP) and newly transferred special education programs.

4. Provide staff development that emphasizes instructional strategies and techniques for teachers who are teaching mainstreamed special education students.

5. Continue to train and educate all staff about the importance of and the requirements regarding participation in the IEP process.

Standard Partially Implemented

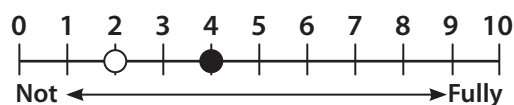February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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         0  1  2  3  4  5  6  7  8  9  10
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           Not ←----------------→ Fully
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3.12   Instructional Strategies

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.)

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Board policies and regulations

Summary of Third Comprehensive Review, March 2012

Although there had been some progress on this standard, some issues remained. The district still lacked a common structure and understanding regarding the delivery of educational services for special education students who have been mainstreamed. The lack of regular education staff members' participation in the IEP process also needed to be addressed.

Summary of Fourth Comprehensive Review, March 2013

The district is beginning to implement a co-teaching model for mainstreamed students. Although progress continues in special education, the district has not addressed the need to provide training for regular classroom teachers in instructional strategies for mainstreamed students. Participation of regular education staff in the IEP process continues to be lacking.

Findings

1. The district is beginning to implement the co-teaching model for special education students who are mainstreamed. Instructional aides are also in the regular education classrooms to support mainstreamed students. It was not clear what additional professional development was provided to ensure effective implementation of the co-teaching model.

2. Regular education teachers have minimal participation in the IEP process and do not regularly attend IEP meetings as required. When accommodations or modifications are included in the IEP, the general education teachers provide little or no input into those decisions. This is not in compliance with state or federal regulations.

3. Regular education teachers do not receive training on effective practices and strategies for working with mainstreamed special education students who are placed in their classes. FCMAT observed the use of very few instructional strategies for working with mainstreamed students.

Recommendations for Recovery

The district should:

1. Continue to monitor and support the implementation of co-teaching to ensure that students are benefiting from this model.

2. Hold regular education teachers and site administrators accountable for attendance, input and involvement in the IEP process. As recommended in the May 2011 Special Education Review, arrange presentations for all general education teachers and administrators to review the following:

   • The requirement that at least one regular education teacher attend all IEP meetings, not just provide input.

   • The requirement that regular education teachers provide accommodations and modifications as indicated on a student's IEP.

3. Provide support to teachers and administrators so that special education students benefit from mainstreaming. Provide training for teachers in strategies that get the best results for students with disabilities. Monitor the support special education teachers provide to regular education teachers when students are mainstreamed.
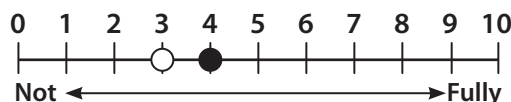
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

3.13   Instructional Strategies

Professional Standard

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

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Classroom observations

3. WASC accreditation report

4. Expected Schoolwide Learning Results (ESLRs)

5. Board policies and regulations

6. Certificated bargaining agreement

Summary of Third Comprehensive Review, March 2012

Little progress had been made on this standard. The teaching observed during classroom visits consisted mostly of teachers giving directions, students working independently with little teacher interaction, or direct instruction. In only a few classrooms were students actively engaged. Students were most often reading silently, completing worksheets, or taking notes from an overhead projection screen during lectures.

Summary of Fourth Comprehensive Review, March 2013

With the inclusion of collaboration days and instructional coaches for teachers at both school sites, the potential exists for significant improvement in instructional strategies, identifiable objectives and outcomes for each lesson, and increased student engagement. However, there continues to be heavy reliance on lectures and worksheets.

Findings

1. The district continues to support weekly collaboration meetings. This time is evenly divided between interdisciplinary PLCs, department PLCs, Focus on Learning PLCs, and committee meetings.

2. The majority of students in the 34 classrooms visited during the FCMAT review were compliantly engaged in the lesson, following along and responding when required. In only 11 of the classrooms were most of the students actively engaged in the lesson, demonstrating interest and responding without teacher prompting. High levels of active student engagement are directly correlated with higher student achievement. FCMAT did

observe the use of a broader range of teaching strategies designed to engage students and encourage active participation.

3. Students interviewed stated that most lessons primarily involve lectures and/or worksheets, with little engagement or discussion. FCMAT also observed heavy reliance on lectures and worksheets.

4. A disproportionate amount of time is spent giving directions and assigning work, reducing the amount of time spent on teaching and learning.

5. The district is making better use of local, regional and community professional expertise to help students develop long-range goals and to introduce career options or mentoring opportunities, especially in agriculture. Linking students with real world applications for their learning can increase student engagement.

6. The district has hired teacher coaches who are helping teachers identify and implement effective teaching strategies that improve student learning.

7. Classrooms walkthroughs are more common and are being conducted by district and site administrators, teacher coaches and PLC team members.

Recommendations for Recovery

The district should:

1. Continue to strengthen and refine collaboration plans and calendars. Prioritize and set dates for specific collaboration and staff development efforts and trainings.

2. Monitor classrooms for implementation of strategies that increase student engagement.

3. Visit other school sites or districts with similar demographics that have demonstrated high levels of student engagement, resulting in higher achievement for all students.

4. Strengthen and increase partnerships with the University of California, California State University, Hartnell Community College and other community colleges, universities and institutes of higher learning to inform parents and students of post-secondary educational opportunities.

5. Further expand the use of the professional expertise from the local region and communities to help students develop long-range goals, career options or mentoring opportunities, especially in agriculture.

Standard Partially Implemented

February 2010 Initial Rating: 2
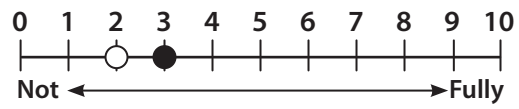
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

Implementation Scale:

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          Not ←─────────────────→ Fully
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3.15   Instructional Strategies

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.

Sources and Documentation

1. Master schedules for both school sites

2. California English Language Development Test (CELDT) Results for 2011-12

3. Interviews with teachers, administrators and instructional aides

4. Interviews with students and parents

5. Classroom observations

6. Title III Plan

7. Interview with the King City Elementary School District superintendent

Summary of Third Comprehensive Review, March 2012

The district API for all students increased from 639 in 2008-09 to 706 in 2010-11; this was a substantial increase. However, a gap remained between this average and the average API scores of 671 for English learners and 529 for students with disabilities. The district needed to address the assessment, placement and instructional program for English learners and to continue the improvements being made in special education if it was to see significant growth in student achievement.

Summary of Fourth Comprehensive Review, March 2013

The district has increased the number of alternatives for underperforming students, students with disabilities, and English learners. Concerns were expressed regarding the placement of students in these alternative and intervention classes and their access to instructional opportunities that will move them back in to regular classes and allow them to remain on track for a diploma. The district is reaching out to feeder schools to improve the high school experience for the children in both King City and Greenfield.

Findings

1. The district is offering more alternatives for underperforming students, students with disabilities, and English learners. These offerings include credit recovery classes, CAHSEE support, ELD, SDAIE, mainstreaming with co-teaching and instructional

aide support, strategic and intensive intervention, and after-school and Saturday school academic and language support.

2. Parents, staff and students expressed concern about the placement criteria for students in these alternative classes. For many students these classes become the norm and there is little movement to regular and higher-level courses. Students placed in intervention classes frequently remain in the class for a semester or more, and sometimes for more than a year.

3. CELDT results show little movement in English language development after students reach language level 3. The district has set a goal to increase the number of English learners who are reclassified.

4. Classroom visits provided evidence that the co-teaching model for mainstreamed students with disabilities is being implemented, and that there is strong staff support for this model.

5. The district is involved in collaborative efforts with feeder schools to address the needs of English learners.

6. Parents, students and staff would like to see more electives for all students. They expressed concern that many students never have an opportunity to participate in electives that might motivate them to come to school and stay in school. They all acknowledged that they understand the fiscal challenges that have reduced these opportunities. They were hopeful that the return to a seven-period day would allow for additional electives and not just remedial classes. Students were specifically interested in electives so they could have fewer open periods and so that serving as a teacher's assistant was not their only option to fill their schedules.

7. See also the related findings regarding the achievement gap in Standard 3.1.

Recommendations for Recovery

The district should:

1. Focus its efforts on alternatives and interventions that accelerate learning, with the goal of getting most students back in regular classes and on track for graduation by the start of their sophomore year.

2. Support the development of a master schedule that ensures that all students have access to appropriate instruction and that allows students to move out of interventions and alternative classes as quickly as possible.

3. When fiscal conditions allow, consider adding more electives for students. Provide opportunities for students and teachers to share their interest in this topic and their ideas for changes they would like to see.

4. Continue to provide support to teachers and administrators so that special education students receive the maximum benefit from mainstreaming. Provide training for teachers in strategies that get the best results for students with disabilities. Continue to monitor the support special education and regular education teachers receive in the co-teaching model.

5. Monitor the use of appropriate instructional strategies in all classrooms to ensure that English learners have access to the core content areas at their grade level. Identify teachers who are using appropriate strategies and getting results, and provide time for them to serve as models for and coach other teachers who need support.

6. Visit a district that has a large EL student population and is making significant progress, such as the Delano Joint Union High School District, to observe the kinds of support that can be provided for EL students and their teachers.

7. Ensure that students in ELD and SDAIE classes are receiving instruction appropriate to their language levels and that appropriate strategies are being used.

8. See the recommendations in Standard 3.1 related to student achievement and measures to help close the achievement gap.

Standard Partially Implemented

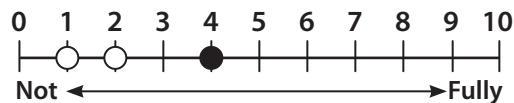February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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           0  1  2  3  4  5  6  7  8  9  10
           |––○––○––|––●––|––|––|––|––|––|
           Not ←––––––––––––––––––→ Fully
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3.16 Instructional Strategies

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.

Sources and Documentation

1. Interviews with teachers and administrators

2. Student achievement results (state and local)

3. Review of selected benchmark assessment from each school site

4. Collaboration time agendas and minutes

5. CELDT results

6. Master schedules for both school sites

Summary of Third Comprehensive Review, March 2012

The district had made some progress in developing components of a comprehensive assessment system, but it was not complete or reliable for appropriately placing students in intervention or leveled classes. Common assessments were not complete or used by all departments and teachers. Teachers were using the SChoolPlan data management system more, but its usefulness was limited by the absence of a comprehensive and fully implemented districtwide assessment system that included both state and local assessments.

Summary of Fourth Comprehensive Review, March 2013

The district continues to make progress in developing a districtwide comprehensive assessment system to ensure that students are placed in and exited from classes appropriately. Common assessments are being developed but are not implemented districtwide for all core content areas. Teachers and administrators have a greater sense of urgency for an assessment system that will support them and help reach the achievement goals set by the state administrator.

Findings

1. There is no fully implemented, comprehensive districtwide assessment system that provides sufficient variety and frequency of shared student performance data to ensure that students are placed in intervention classes or leveled classes appropriately, or that allows their progress to be monitored to determine if a change in placement is needed.

2. There is evidence of the use of common assessments when they have been completed for a content area or a specific course; however, they have not been completed for all core content areas and are not yet a reliable component of a districtwide comprehensive

assessment system that can be used to shape and influence instruction or measure individual student learning.

3. The district continues to rely heavily on state assessment data, primarily the CSTs, CAHSEE, and CELDT for individual student placement. The district also considers teacher recommendations when placing students.

4. The SChoolPlan data management system is intended to provide teachers and administrators with timely and useful data to use in planning, student placement and progress monitoring. Not all teachers are using the system, and there are delays in posting class rosters and testing data, restricting the effective use of the system. All teachers have been trained in the use of the system.

5. Interviews and discussions indicate that there is a greater awareness of student achievement data. There is also evidence that the when data is available it is used by teachers and departments to guide conversations about improving student achievement.

6. The district continues to provide support for students who have not passed the California High School Exit Exam (CAHSEE).

7. The district is introducing the concepts of Response to Intervention (RTI) and tiered progressive interventions (known as a pyramid of interventions) to ensure the appropriate placement of students in leveled and intervention classes. The district will need a comprehensive, districtwide assessment system to fully implement these strategies.

Recommendations for Recovery

The district should:

1. Continue efforts to develop and fully implement a districtwide comprehensive assessment system that provides sufficient variety and frequency of shared student performance data to ensure that students are placed in intervention classes or leveled classes appropriately. This system should also provide the information necessary to exit students from these classes in a timely manner.

2. Ensure that the district and school sites are in agreement on the essential standards that every student needs to meet and that they are not limited to those on the CSTs and CAHSEE.

3. Continue to work on the districtwide development of common assessments that align with the essential standards for each of the four core content areas. Set a clear deadline for the completion of districtwide common benchmark assessments for all core content areas. Monitor the work to ensure that progress is being made in a timely manner.

4. Review and revise pacing calendars to ensure that they align with the essential standards and common assessments.

5. Monitor the implementation and use of pacing calendars and common assessments, and ensure that results are analyzed during scheduled collaboration time.

6. Provide clear communication to teachers and administrators regarding the purpose and use of the SChoolPlan system. Require everyone to use the system when common data is available.

7. See the related recommendations in Standard 2.4.

Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

3.17   Instructional Strategies

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.

Sources and Documentation

1. CELDT results for 2011-12

2. Title III Plan

3. Federal Program Monitoring (FPM) schedules and reports

4. Master schedules for both school sites

5. Interviews with teachers, administrators and instructional aides

6. Classroom observations

7. Board policies

8. Consolidated Application

9. Interviews with board members

Summary of Third Comprehensive Review, March 2012

The district had worked to make certain it was in compliance with the rules and regulations for educating English learners. However, there was little indication that the programs offered for these students were getting positive achievement results.

Summary of Fourth Comprehensive Review, March 2013

The district has made progress in analyzing the needs of English learners through a more thorough review of CELDT scores, and is providing training for all teachers and administrators in Constructing Meaning and support for implementation. The district has developed goals to address the needs of English learners and is reviewing FPM results and resolving areas of noncompliance. The board is addressing the needs of English learners. Proper identification, targeted and appropriate instruction, and an exit strategy for English learners must be implemented to ensure success for these students.

Findings

1. The district has addressed many of the issues related to program compliance, board policies, plans, instructional materials purchases, and a master schedule that accommodates English learners.

2. The district has provided and all teachers have completed training in Constructing Meaning, a researched-based program for secondary English learners designed to help teachers incorporate academic language instruction into their content area instruction. There is evidence that many teachers are using these strategies but implementation varies. The use of a language objective was only evident in a few classrooms.

3. The district is taking a closer look at California English Language Development Test (CELDT) scores and has set goals for increasing the percentage of English learners who move from one level to another (known as redesignated English learners). The district plans to address the issue of the large number of English learners that do not progress past language level 3 on the CELDT.

4. Several items related to English learners were found out of compliance during the FPM last school year. The district is actively working to resolve these issues.

5. The district English learners advisory committee (DELAC) and the English learners advisory committees (ELACs) at both sites are operational.

6. Board members are addressing the needs of English learners. Some have attended the Constructing Meaning and PLC training and are supportive of the plans being developed under the direction of the state administrator.

7. The district's professional development plan is being revised and will include continued support for Constructing Meaning and PLCs, both of which address the needs of English learners.

8. The district has not met the Annual Measurable Achievement Objectives (AMAOs) for Title III for nine years. There is a significant gap between English learners and other student groups.

9. The district has enough trained and qualified teachers and staff to assess and support the significant number of English learners and their parents.

10. There was not a significant difference between the instructional strategies used in English language development (ELD) and specially designated academic instruction in English (SDAIE) classrooms and those used in regular classrooms. The focus on language development and the strategies that will accelerate learning for English learner (EL) students was not evident in most of these classrooms. There were very few opportunities for EL students to use expressive language and academic vocabulary.

Recommendations for Recovery

The district should:

1. Use the expertise available in the district, or contract with specialists, to focus on the needs of EL students. Provide training for administrators, teachers and coaches to assist in assessing, placing, monitoring and exiting EL students.

2. Closely monitor and support ELD and SDAIE classes to ensure that instruction is appropriate for English learners and their specific language levels.

3. Provide all teachers with the CELDT language levels of all of the English learners in their classroom so that they can more effectively differentiate instruction to accommodate these students and accelerate their learning.

Continue to implement the following three recommendations from the February 2010 and March 2011 comprehensive reviews:

4. Develop and implement policies, procedures and common practices that ensure that EL students are identified and placed in programs and classes that align with their level of English proficiency as determined by the CELDT.

5. Ensure that EL students have access to the core standards-aligned curriculum and receive daily ELD instruction from qualified teachers. This should include specific classroom support for ELs such as academic language, SDAIE, primary language support, differentiation, direct instruction, and appropriate grouping.

6. Ensure that the student achievement monitoring system discussed in Standard 3.16 includes the longitudinal data needed to assess individual EL students' progress, make appropriate student placements in courses, and make accurate exit decisions.

Standard Partially Implemented

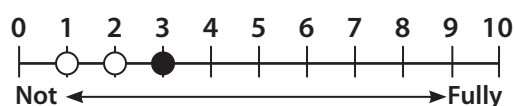February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

Implementation Scale:

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          Not ◄─────────────────►Fully
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3.18   Instructional Strategies

Professional Standard

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

Sources and Documentation

1. Interviews with district and site administrators, teachers and district support staff

2. Interviews with coaches

3. Classroom observations

4. Interview with the King City Elementary School District superintendent

5. Agendas, minutes, and schedules for collaboration days

Summary of Third Comprehensive Review, March 2012

The district had been successful in employing specialists to address the need for improvement in its alternative and special education programs. It was working toward making the best use of teacher leaders, teacher experts and collaboration time to address the need to improve student achievement.

Summary of Fourth Comprehensive Review, March 2013

The district has chosen leaders at both sites who can support the changes needed to improve achievement for all students, and it is using current staff members' expertise to provide professional development and support for implementation. Collaboration time is focused on improving teaching and learning and includes additional time for professional development. The district needs to ensure that there is continued support for the progress made in improving services for special education students.

Findings

1. The district has chosen leaders at both school sites who can support the changes needed to improve achievement for all students.

2. The district is using teachers who have become certified trainers and administrators with PLC expertise to provide training and classroom support. The district has been able to hire 1.5 full-time equivalent (FTE) academic coaches with support from the GEAR UP program at California State University, Monterey Bay.

3. The district is working collaboratively with its feeder districts to find ways to provide common professional development. This promotes better transitions for students and makes better use of fiscal and human resources.

4. The district supports weekly collaboration time that is focused on improving teaching and learning. Site and district administrators regularly provide direction, monitoring and support to ensure that collaboration time is productive. Collaboration time allows for additional professional development opportunities for teachers and administrators.

5. The district is considering working with a specialist in English learner instruction to ensure that the program it offers will have good results for students.

6. The district has continued using a special education specialist to assist with program quality and compliance.

7. Co-teaching and instructional aide support is in place to support special education students mainstreamed into regular classes.

Recommendations for Recovery

The district should:

1. Continue to use the expertise of its own staff to provide professional development and to support implementation of the training.

2. Work with a specialist in English learner instruction to ensure that the EL program offered by the district results in academic success for students.

3. Provide training and support for all staff members who serve in a coaching or mentoring role so that teachers and students receive the maximum benefit from this resource.

4. Continue to use teacher collaboration time to improve teaching and learning, and monitor collaboration time to ensure that it is being used for this purpose. Structure the time to support the activities outlined in the district's professional development plan.

5. Continue to support the changes that have been made to provide appropriate settings and instruction for special education students.

Standard Partially Implemented

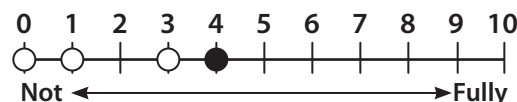February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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        Not ◄─────────────────► Fully
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3.22   Instructional Strategies

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, SBE 51226)

Sources and Documentation

1. Interviews with district and site administrators, teachers, support staff, parents and students

2. Single Plan for Student Achievement (SPSA)

3. WASC accreditation report

4. LEA Plan

5. Board policies and regulations

6. Master schedules for both school sites

7. Student registration materials and course descriptions

Summary of Third Comprehensive Review, March 2012

Significant progress had been made in the area of agriculture, providing students with more options in this field and garnering the support of the local agricultural community. There was no significant evidence of similar efforts for any other technology or industry program or interest area.

Summary of Fourth Comprehensive Review, March 2013

The district has not yet implemented this standard. Although the district is constrained by limited resources, this is an area that needs to be addressed to meet the needs of the students and the community. The district continues to offer courses in agriculture, with community involvement and student participation. It has the potential to develop other career-technical programs but has not yet done so.

Findings

1. The district offers limited opportunities for a comprehensive multiyear program of integrated academic and technical study that is organized around a broad theme, interest area or industry sector.

2. There is no evidence that the district has a clearly defined vision of the potential structure, content and organization of such an integrated academic and technical program of study organized around a broad theme, interest area, or industry sector.

3. Information on the district's website regarding its academic and technical programs is improving.

4. The district continues to offer agriculture courses, which have involvement from the community and student participation. There is potential to develop other career technical programs but it has not yet done so.

5. Discussion is taking place regarding the development of an agricultural partnership academy. This would provide a link between the classroom and real world applications of skills and knowledge, and expand opportunities for students because the community has many resources to offer such a program. The agriculture programs have engaged some community employers to talk with students about local career opportunities and the educational requirements for those jobs. Helping students connect what takes place in the classroom with real world applications can make a significant contribution to improving student achievement.

Recommendations for Recovery

The district should:

1. Promote and increase its agricultural department and program offerings to meet the needs of the heavily agricultural community it serves. Seek community partnerships and grant funding to expand this program area. Actively pursue the development of an agricultural partnership academy.

2. Establish sequential course offerings that allow students to pursue an identified technical and academic interest.

3. Consider surveying the business and industrial opportunities in Monterey County and/or nearby counties when developing technical and academic programs organized around a broad theme. Seek to establish partnerships with industry and business to expand this program area.

4. Develop advisory groups made up of lay people and community members to further develop the infrastructure of vocational planning and partnerships.
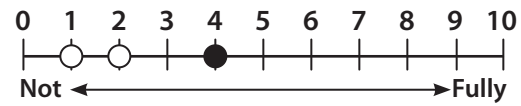
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← ——————————— → Fully

4.3   Assessment and Accountability

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.

Sources and Documentation

1. Interviews with teachers, site administrators and district staff

2. Sample assessments

3. Greenfield High School Single Plan for Student Achievement, dated October 17, 2012

4. King City High School Single Plan for Student Achievement, dated November 11, 2011

5. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

Summary of Third Comprehensive Review, March 2012

Teachers continued to work in their school departments to develop common benchmark assessments. The district was still in the very early phase of learning to use assessment results to shape, influence and direct instructional practices as part of an ongoing process of continuous improvement. Staff reported loading assessment results into SChoolPlan.

Summary of Fourth Comprehensive Review, March 2013

Teachers continue to collaborate in school department teams to analyze student data and develop or refine common assessments, and they are working in interdepartmental PLCs to implement Constructing Meaning strategies. Teachers and administrators have begun to make some progress in using assessment results and classroom observations to improve instructional practice. Some teachers have begun to change their classroom practices but in many classrooms these strategies were not evident. There is also little collaboration between the two comprehensive high schools.

Findings

1. Staff members at both comprehensive high schools continue to work collaboratively within their departments at their sites to develop and update common standards-based benchmark assessments and to analyze assessment results. Teachers reported that they are updating the benchmark assessments when there is a need and spending more time talking about the data. However, teachers noted that the benchmark assessments would need to be revised to align with the common core standards. They anticipate the need to include more performance-based assessments and more writing in the assessments in preparation for the common core assessments.

2. Limited collaboration has occurred between the two comprehensive high schools and with the feeder elementary districts. The English teachers from the two comprehensive high schools met to discuss common practices across the two sites. Math teachers at Greenfield High School met with Algebra teachers from the feeder school to develop an Algebra I diagnostic assessment. At King City High School, collaboration with the elementary district is occurring in preparation for the common core standards.

3. Administrators and some teachers acknowledged that collaboration time was not always used effectively in the past and indicated that it is being used more productively this year. Both school principals are providing more direction and structure for collaboration time so that the time will be used more effectively to shape and influence improvements in instructional practices. At the time of the review, the principals had provided teachers with specific directions and agendas for the use of the collaboration time this school year. Both principals indicated that their goal this year is to help the collaborative teams become more self-directed in their efforts to use data to plan instructional improvements.

4. Teachers are also working in interdepartmental PLCs to implement Constructing Meaning strategies. Teachers will also analyze data in their interdepartmental teams later this school year.

5. Teachers indicated that they understand the need for more structure in the collaboration time, but some indicated that they felt that meeting in department teams for collaboration only once per month did not provide enough time for the needed collaboration. They expressed concern about having enough time to update assessments to prepare for the common core standards.

Recommendations for Recovery

The district should:

1. Provide staff with training and coaching in developing and using assessments to influence and shape instruction.

2. Use assessment results to identify students who need additional support, and provide this support.

3. Continue efforts to develop benchmark assessments and accelerate the work of adopting one set of districtwide common benchmark assessments. Benchmark assessments should be administered at least three times per year, and all data should be loaded into SChoolPlan.

4. View assessment not as an event but as a system with all the tools and resources needed for continuous improvement in teaching and learning.

Standard Partially Implemented

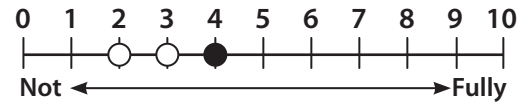February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        |——|——○——○——●——|——|——|——|——|——|
        Not ←——————————————→ Fully
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4.4   Assessment and Accountability

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.

Sources and Documentation

1. Interviews with teachers, site administrators and district staff

2. Sample summative assessment

3. Sample formative assessment

4. Sample benchmark assessment

Summary of Third Comprehensive Review, March 2012

The district had made progress in developing an assessment and data system that met administrators' and teachers' needs for instructional decision-making and monitoring. It was still not complete and there had not been clear communication regarding the timelines for completion and implementation. Teachers indicated an increased understanding of the value of more frequent assessments and the importance of collaboration using assessment results.

Summary of Fourth Comprehensive Review, March 2013

The district provides teachers and administrators with the Aeries student information system and SChoolPlan for analysis of assessment data. Teachers have been provided with professional development on in the use of SChoolPlan and in using assessment data in instructional decisions and monitoring. However, use of SChoolPlan is inconsistent.

Findings

1. Teachers indicated that they have access to the Aeries student information system and SChoolPlan to obtain and analyze student assessments results. Some teachers stated that SChoolPlan is too difficult to use, and as a result the district is beginning to look for an alternative to this software. Until another tool is selected, some teachers have stopped using SChoolPlan and are using Microsoft Excel or other tools to analyze assessment results. Teachers also indicated that, because of problems with the master schedule, SChoolPlan did not have correct rosters for classes at the beginning of the school year. As a result, early in the school year, some teachers analyzed data for their classes by hand or by using Microsoft Excel. Although not all teachers are using SChoolPlan, teachers and administrators indicated that more teachers are analyzing data and using the results to plan instructional improvements or identify students who need additional intervention.

2. See the related findings in Standards 2.4 and 3.16.

Recommendations for Recovery

The district should:

1. Ensure that the results of the common assessments are analyzed by collaborative teams of teachers and used to improve instruction to ensure that all students are achieving at high levels.

2. Provide focused professional development and ongoing coaching to help teachers learn to analyze data to identify any changes needed in their instruction. The professional development provided must go beyond theory: it should provide teachers with a clear understanding of how to use data to shape their teaching. Professional development should be coordinated with coaching so that teachers receive a consistent, focused message about how to use assessment results and how SChoolPlan can help them access and analyze data.

3. Continue to develop common assessments, but move beyond the nearly exclusive focus on developing benchmarks so that teachers have time to learn how to use assessment results to improve their instruction.

4. See the related recommendations in Standards 2.4 and 3.16.

Standard Partially Implemented

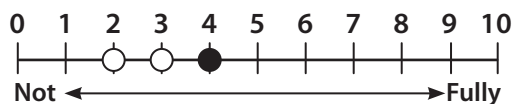February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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        0   1   2   3   4   5   6   7   8   9   10
        |---|---○---○---●---|---|---|---|---|---|
        Not ◄──────────────────────► Fully
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4.5   Assessment and Accountability

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.

Sources and Documentation

1. Interviews with teachers, site administrators, district staff and students

2. Greenfield High School Single Plan for Student Achievement, dated October 17, 2012

3. King City High School Single Plan for Student Achievement, dated November 11, 2011

4. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

Summary of Third Comprehensive Review, March 2012

Little progress had been made in identifying and providing services for students who required close monitoring, differentiated instruction, additional targeted assessment, specific research-based intervention, or acceleration.

Summary of Fourth Comprehensive Review, March 2013

The district is beginning to monitor students who need additional support and provide targeted interventions to address their needs. Teachers and administrators reported an increase in after-school tutoring and credit recovery options for struggling students. The district has adopted a goal to develop and implement interventions for students who need them.

Findings

1. The district is working to expand its approach to placing students in classes. During previous FCMAT reviews, individuals interviewed indicated that the results of state assessments were the primary means of assigning students to classes. Teachers interviewed for the current review stated that in some cases the results of local assessments, teacher recommendations and course grades are also now used to help place students.

2. The district has provided professional development on the effective use of disaggregated data and is providing on-site coaching to help teachers and administrators use data analysis to shape and influence changes in instructional practice.

3. The state administrator created specific, measurable goals for the 2012-13 school year, including a goal to identify and implement interventions for students who need them.

Goals were shared with staff, and both teachers and administrators indicated their commitment to meeting the goal to implement interventions.

4. The district identified the need to provide more credit recovery options for students who have failed one or more classes, and as a result has adopted an online program that provides credit recovery classes. Students are able to use this program to make up courses as needed. Because the district has returned to a seven-period school day, students may now take credit recovery classes during the school day and thus have more opportunities to make up course credits. Another option for credit recovery is Saturday school. Administrators reported that to date this year students have not fully used the Saturday school option. For example, approximately 50 students at one site were eligible to participate but only 19 attended. Increased access to credit recovery has led to a decrease in the number of students who take credit-recovery courses at the community college.

5. Teachers reported that there are more options for students who need assistance after school.

6. Teachers and administrators indicated that more options are needed for struggling students. It meets the needs of some students, but others need additional options. The district's policies continue to prohibit students from retaking failed courses. Students are using the online credit recovery program to make up these credits, but some students indicated that they would like the option to repeat classes. Some teachers indicated that more intensive interventions would be helpful in preventing students from failing classes. Teachers at both schools also stated that an increase in discipline problems in class is hindering their ability to help students who need additional support.

7. Teachers and administrators also indicated that more support and strategies are needed for English learners who do not make progress toward fluency in English. Administrators are working to ensure teachers know the CELDT levels of students in their classes and to develop multiple strategies to help students who remain at the same CELDT level over time. Administrators indicated that they believed many teachers were not aware of the CELDT levels of their students.

8. The district has adopted Constructing Meaning strategies as one approach to provide additional support for English learners. Some teachers are using strategies such as sentence frames and specific language objectives for each lesson, but other teachers indicated that they are still working to determine how to integrate into their classrooms the professional development they have received in Constructing Meaning. The district has hired coaches to help teachers fully implement Constructing Meaning and is providing teachers with the time to observe in colleagues' classrooms. There are plans to hold teachers accountable for collaborating on the results of these classroom observations to shape ongoing incorporation of Constructing Meaning strategies into daily practice.

Recommendations for Recovery

The district should:

1. Provide ongoing coaching and professional development on the effective use of disaggregated data to ensure that changes in teaching practice are implemented and refined over time. Coaching should focus on effective classroom practices to meet the needs of all students and on the effective use of collaboration.

2. Engage teachers in using collaboration time to analyze disaggregated data and identify areas in which additional strategies are needed to narrow the district's achievement gaps and improve student achievement. Encourage teachers who are getting good results to share their strategies with other teachers. Provide additional professional development on effective strategies. Provide coaching and support to help teachers make effective use of collaboration time.

3. Provide professional development and ongoing coaching support to teachers, and then hold them accountable for analyzing data, modifying classroom practices and providing interventions for struggling students based on data.

4. See the related recommendations in Standards 2.4 and 3.16.

Standard Partially Implemented

February 2010 Initial Rating: 1
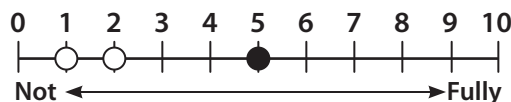
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

Implementation Scale:

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      0   1   2   3   4   5   6   7   8   9  10
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      Not ←─────────────────────────→ Fully
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4.8   Assessment and Accountability

Professional Standard

Principals and teachers in underperforming schools and/or in schools under mandated improvement programs are provided special training and support by the LEA. Improvement plans are monitored.

Sources and Documentation

1. LEA Plan

2. District goals for 2012-13

3. Single Plan for Student Achievement (SPSA)

4. Interviews with administrators, teachers, district support staff and board members

5. Interviews with school site council (SSC) members

Summary of Third Comprehensive Review, March 2012

The district had created a professional development plan, and implementation started in March 2011. The district needed to ensure the plan was aligned with the LEA Plan Addendum and the SPSAs, and that it was monitored as part of the tracking of all district plans. Creating a leadership team would help in the monitoring of district plans.

Summary of Fourth Comprehensive Review, March 2013

The site and district plans required by state and federal funding are being developed, implemented and monitored by both district and site administrators. There is a concerted effort to update and align all site and district plans. School site councils are organized and operational. District and site administrators, district support staff, teachers and board members are all participating in professional development activities.

Findings

1. The district is updating its LEA Plan to include improvement goals for 2012-13 and alignment with other district and site improvement plans, including Title III, professional development, SPSAs, WASC and others.

2. School site administrators are actively involved in developing and implementing their SPSAs, which now include current student achievement data and activities with deadlines and specifics. Providing timely categorical budget information to the sites continues to be delayed beyond the start of the school year. This presents a challenge to planning and timely implementation of programs that directly affect student achievement.

3. The district's professional development plan is being updated to ensure that professional development supports full implementation of all site and district improvement plans.

4. Site and district administrators are monitoring the implementation of improvement plans (LEA Plan, SPSAs, WASC, and Title III). School site councils have been involved in reviewing plans and making recommendations.

5. Administrators and teachers are participating in district-provided training that was planned based on students' academic needs.

Recommendations for Recovery

The district should:

1. Continue to align the districtwide professional development plan with the LEA Plan, the SPSAs, Title III, and WASC. Include the individuals responsible, and prioritize the activities.

2. Review plans each year to determine whether the activities included in the plans and the allocation of resources are helping reach the student achievement goals that have been set.

3. Consider creating a leadership team to help monitor district plans. The leadership team should include district and site administrators, teachers, classified staff, SSC representatives, and other staff as appropriate.

Continue to work toward fully implementing the following recommendations provided in the first comprehensive review report in February 2010.

4. Ensure that district and site budgets support the professional development activities, starting with those identified as the highest priority.

5. Ensure that district and site administrators take responsibility for monitoring the implementation of professional development.

6. Because the professional development required to implement the LEA Plan cannot be accomplished in one year, prioritize the activities in the plan based on student needs and indicate, over a three-year period, when the specific item will be accomplished. Include the individuals responsible for carrying out activities and the funding source. The professional development plan should be a working document that is monitored and communicated to everyone involved. School site council (SSC) members need to be aware of the plan so that they can support the district's priorities.

Standard Partially Implemented
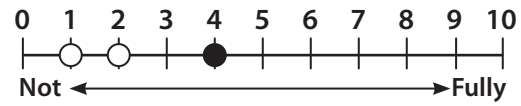
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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    0  1  2  3  4  5  6  7  8  9  10
    |--○--○--|--●--|--|--|--|--|--|
    Not ←              → Fully
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4.10   Assessment and Accountability

Professional Standard

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

Sources and Documentation

1. Walkthrough protocols

2. Classroom observations

3. Interviews with teachers, administrators and coaches

4. Collaboration schedules, agendas and minutes

Summary of Third Comprehensive Review, March 2012

Very little had been done to monitor program implementation to ensure better results for students. Many structures and programs had been put in place, but no corresponding training had been provided, nor had a plan for monitoring been implemented.

Summary of Fourth Comprehensive Review, March 2013

There has been significant progress in monitoring program implementation. All personnel are aware of the goals and expectations outlined by district and site administrators. Teachers have requested consistent and constructive feedback from administrators' and coaches' regular classroom walkthroughs. District and site administrators are knowledgeable and skilled in monitoring all aspects of the district's instructional programs.

Findings

1. There has been good progress in monitoring the implementation of programs. The current site administrators are knowledgeable and skilled in monitoring all aspects of the instructional programs on their campuses and are fully engaged in the process. District administrators and coaches also participate in this effort.

2. Principals, district administrators and coaches all carry out regular classroom walkthroughs. Protocols to monitor program implementation have been developed and are being used during these walkthroughs.

3. Collaboration time is structured and monitored through observation, providing agendas, and reviewing minutes.

4. The WASC review process includes active participation by teachers and administrators, and the Focus on Learning PLC is included in collaboration time.

5. The teachers are requesting consistent and constructive feedback on the results of classroom walkthroughs and the work being done during collaboration time.

6. The use of board-approved instructional materials is not consistent across content areas and programs, and there is no evidence that full implementation of these materials is monitored. Interviews and classroom observations revealed that some teachers are not aware of the expectation that they use board-approved instructional materials, including literature.

Recommendations for Recovery

The district should:

1. Continue the practices that have been developed to effectively monitor and support program implementation. Evaluate and refine protocols after using them for a year to ensure maximum benefit from this practice. Get teacher input on the development of protocols for classroom walkthroughs.

2. Consistently provide feedback to teachers on classroom walkthrough results and the work done during collaboration time. Feedback does not always need to be to individual teachers; it can be a summary shared with everyone on the results of a week or two of classroom walkthroughs. For example, the principal might indicate that for the next two weeks he or she will be looking for ways teachers are writing and using language objectives, the topic of a recent professional development session. The principal could provide feedback to teachers as a group on the number of classrooms in which he or she saw language objectives in use and share examples of well-written objectives and the effective practices observed.

Continue to work toward full implementation of the following recommendations provided in the first comprehensive review report in February 2010:

3. Develop clear expectations for implementing and monitoring district-approved standards-based programs and instructional materials, including those for English language development (ELD) and special education.

4. Ensure that pacing guides are aligned with instructional materials, the California frameworks and the CST and CAHSEE blueprints, and ensure that all staff members discuss and know them so that the agreed-upon essential standards are taught systematically districtwide.

Standard Partially Implemented

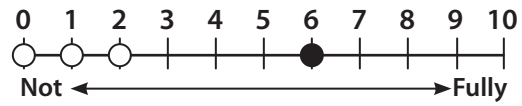February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

Implementation Scale:

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  Not ◄──────────────────────►Fully
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4.12   Assessment and Accountability

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, on-going training to ensure proper implementation.

Sources and Documentation

1. Interviews with district and site administration, teachers, support staff, parents and students

2. Board policies and regulations

Summary of Third Comprehensive Review, March 2012

The district had completed its transfer of special education programs from the Monterey County Office of Education and was establishing a structure to ensure that all special education students' needs were identified and met. The district also needed to provide the professional development needed to ensure that its updated special education policies were implemented.

Summary of Fourth Comprehensive Review, March 2013

The district continues to develop and implement appropriate practices and procedures for special education staff and students. Deficiencies in chain of command, communication, and cohesive efforts among special education staff impede the implementation of practices and procedures designed to benefit students.

Findings

1. Progress continues in updating board policies regarding the special education program.

2. Progress has been made in organizing and completing special education master files. They are housed at the district office, are accessible, and can be tracked when removed from the district office.

3. Teachers and staff do not uniformly understand and apply policies and procedures to ensure the appropriate application of special education rules and regulations. This issue was also noted in the May 2011 special education review.

4. There are numerous deficiencies in the special education department including chain of command, clear communications and efforts at cohesiveness. These issues impede the implementation of practices and procedures designed to benefit students.

5. District policies and communications are available on the district's website in English but not all are in Spanish.

Recommendations for Recovery

The district should:

1. Address the deficiencies in the special education department that are interfering with implementation of the positive changes that have been made to the program in the last two years.

2. Continue to review and revise board policies and administrative regulations.

3. Continue to follow the recommendations in the May 2011 Special Education Review to organize and ensure that all special education master files are complete, are housed at the district office, and are accessible and trackable when removed from the district office.

4. Provide policies, communications and other information in Spanish on its website.

5. Provide support to teachers and administrators so that special education students benefit from mainstreaming. Provide training for teachers in instructional strategies that get the best results for students with disabilities. Monitor the support special education teachers provide to regular classroom teachers when students are mainstreamed.

Standard Partially Implemented

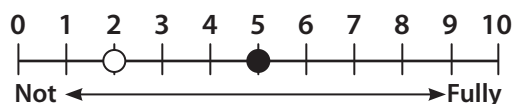February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 5

Implementation Scale:

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           Not ←              → Fully
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5.1 Professional Development

Legal 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.

Sources and Documentation

1. Interviews with teachers, board members and site and district administrators

2. Greenfield High School Single Plan for Student Achievement, dated October 17, 2012

3. King City High School Single Plan for Student Achievement, dated November 11, 2011

4. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

5. Board Policy 4131, Staff Development, dated December 14, 2005

Summary of Third Comprehensive Review, March 2012

The district had created a professional development plan as recommended, but the plan needed more detail if it was to significantly affect student outcomes. Because professional development is costly, lower cost strategies that take advantage of in-house expertise and collaboration time needed to be pursued. Professional development needed to be targeted and prioritized based on students' needs.

Summary of Fourth Comprehensive Review, March 2013

The district has made significant progress in developing and implementing a continuing program of professional development. Teachers, site and district administrators are implementing Constructing Meaning strategies, participate in PLCs, and have begun discussions on implementing common core standards. There are collaborative efforts with feeder districts to share professional development. Board members are participating in study sessions with the state administrator.

Findings

1. The district has established a more coherent, coordinated approach to professional development to improve instruction and has chosen to focus much of its efforts this school year on Constructing Meaning strategies. The district has provided all teachers with professional development on this approach. In addition, the district has hired coaches to help teachers learn to incorporate these strategies into their teaching practices. Administrators are also providing teachers with time to observe in other classrooms and to collaborate in interdepartmental teams on the results of these observations.

Administrators plan to have teachers perform additional observations and will use future collaboration days to have teachers discuss and explore in greater depth their implementation of Constructing Meaning. Many teachers and administrators are engaged in the focus on Constructing Meaning, but some teachers indicated that they have not yet determined how to begin incorporating these strategies into their teaching.

2. Administrators and teachers reported that professional development is more focused than in previous years. The district has committed to providing in-house training and is using the expertise of existing staff in these sessions. Administrators indicated that teachers no longer submit requests to attend isolated, one-time professional development opportunities outside of the district. District administrators reported that teachers initially approached them about in-house training for developing professional learning communities as a solution to limited resources. Teachers expressed support for the district's approach to providing professional development.

3. Administrators and teachers now recognize collaboration time as an extension of the professional development provided by the district, and administrators are providing more focus and structure for collaboration time. Some teachers reported that the structure is resulting in more effective use of collaboration time this year. Other teachers reported that this structure and the fact that departmental collaboration has been decreased to only once per month has resulted in less time for their department to prepare for implementation of the common core standards.

4. Board members indicated that they participate in study sessions with the state administrator on a variety of topics, including analysis of the district's assessment results and research-based practices. Board members expressed support for these study sessions and stated that they are benefitting from them.

5. The district's professional development plan is being updated to ensure close alignment with student learning needs and other school and district plans. The plan will have specific information including budgets, timelines, monitoring processes, and the individuals responsible for implementation.

Recommendations for Recovery

The district should:

1. Continue to identify staff members who are interested and have the skills and knowledge to become teacher leaders and providers of professional development in each subject area. These teacher leaders do not have to be department chairs, but they should be teachers who are demonstrating success with student achievement and who have shown an interest in research-based methods and using data to shape and influence instruction.

2. Continue to build a core team with a shared understanding of the steps needed to improve teaching and learning, and annually update the LEA Plan with more details about specific professional development for instructional staff, administrators and board members.

3. Include in its professional development plan details regarding budget, a specific timeline, how and when the plan will be monitored, and the person or persons responsible for completing the activity.
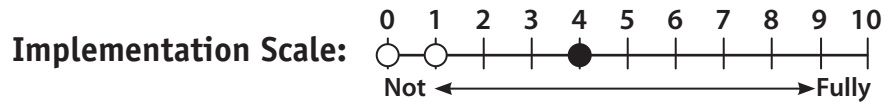
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 4

Implementation Scale:

| 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |

Not ← → Fully

5.3 Professional Development

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.

Sources and Documentation

1. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

2. Interviews with teachers, school site council members and district and site administrators

Summary of Third Comprehensive Review, March 2012

Teachers continued to have weekly collaboration time. However, teachers reported that time was often spent on items and activities that are not related to improving instruction or analyzing data.

Summary of Fourth Comprehensive Review, March 2013

Teachers have weekly collaboration time and are using it to work in department teams, interdisciplinary groups, committees focused on preparing for the WASC review, and school committees. Collaboration time is being used to analyze data, share strategies and effective practices, and plan improvements.

Findings

1. Teachers and administrators indicated that collaboration time is more structured this year, with specific focus provided for each collaborative session. Teachers meet one day per month in departmental teams to review assessment data, develop or update common assessments, share effective practices, and plan improvements. Teachers also meet one day per month in interdepartmental professional learning communities that are focused on Constructing Meaning strategies. At the time of the review, teachers were observing in the classrooms of others in their professional learning community. Administrators indicated that future interdisciplinary collaboration sessions would be used to share the results of these observations and to plan improvements. The teams will then conduct additional observations to see if the planned improvements are occurring. Coaches are available to help teachers implement the improvements they plan during collaboration time.

2. Both comprehensive high schools will undergo WASC reviews later this year. As a result, both schools are engaged in self-studies in preparation for the reviews. One collaboration day per month is used to for WASC Focus on Learning groups.

3. Results of state assessments for 2011-12 were received just prior to FCMAT's review. The state testing and reporting (STAR) scores fell in 2011-12, and teachers and administrators expressed concern over this. They indicated that they are working to

use collaboration time to plan effective instructional improvements to increase student achievement.

4. The final collaboration day per month is spent in school committees that are focused on a variety of topics, including support for struggling students.

5. Although administrators and teachers indicated that collaboration time is more structured this year, some teachers expressed concern about having four separate collaborative groups that only meet once per month. They indicated that it is difficult to resume a conversation that occurred a month ago and said that they often lose time reconstructing where they left the conversation.

Recommendations for Recovery

The district should:

1. Continue to provide professional development and ongoing coaching regarding the use of assessment data to improve teaching and learning. Have coaches available to help teachers during collaboration time, and hold teachers accountable for using this time to plan and monitor improvements in instruction and the effective use of data.

2. Ensure that professional development includes having a district team attend training such as the Professional Learning Communities at Work Institute to help the district build a common understanding of how to meet all students' needs and how to implement and sustain needed improvements.

3. Continue to ensure that administrators provide clear direction and support for collaboration time, including the coaching needed to effectively review student work, analyze common assessment results, identify strengths and areas that need improvement, and change instructional strategies to better meet students' needs.

Standard Partially Implemented
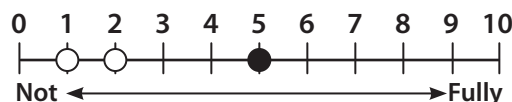
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

Implementation Scale:

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        Not ◄——————————————► Fully
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5.5   Professional Development

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.

Sources and Documentation

1. Interviews with site and district administrators and teachers

2. Board Policy 4131 (a), dated December 14, 2005

3. Greenfield High School Single Plan for Student Achievement, dated October 17, 2012

4. King City High School Single Plan for Student Achievement, dated November 11, 2011

5. Local Educational Agency (LEA) Plan approved by the board on September 14, 2011

Summary of Third Comprehensive Review, March 2012

Responsibility for the alignment of plans across the district had not been assigned and was not monitored. With tight alignment, the district could develop and implement one comprehensive plan for professional development focused on student needs.

Summary of Fourth Comprehensive Review, March 2013

The LEA Plan includes estimates and funding sources to support its implementation. All teachers and administrators were trained in PLCs and in Constructing Meaning and are using and implementing this training. The district is developing a professional development plan. The board approved one SPSA in October 2012 and was scheduled to approve another in November 2012. Both schools were revising budgets to support implementation of those plans.

Findings

1. The LEA Plan approved by the board in September 2011 includes estimates and funding sources to support implementation of some activities included in the plan.

2. The district indicated that the formal professional development plan was still under development. However, administrators and teachers interviewed were certain that the focus of professional development this year was on Constructing Meaning and implementing PLCs. All teachers and administrators were trained in Constructing Meaning and are working to incorporate these strategies into their teaching Funds have been identified and used to hire coaches to help teachers implement these strategies in

their classrooms. The district also acknowledged the need to support principals and vice principals, so coaches have also been hired for these staff members. The professional development plan includes continuation of the work with Constructing Meaning and full implementation of PLCs.

3. The board approved one SPSA in October 2012 and was scheduled to approve another in November 2012. However, the funding estimates provided were not accurate, and budgets in both site plans will require revision. Both schools are revising budgets to support implementation of those plans.

4. See the related findings in Standard 5.1.

Recommendations for Recovery

The district should:

1. Continue to develop and use local expertise to provide in-house professional development when possible. This will help ensure the effective implementation of new strategies, skills and requirements such as common core standards and assessments.

2. Continue to develop and support professional development plans and opportunities that align with the district's goals for improving student achievement.

3. Continue to support staff participation in the Professional Learning Communities at Work Institute or similar professional development to help the district develop a common understanding of how to better meet the needs of all students and how to implement and sustain needed improvements.

4. Once the district has a broader view of how it might structure its approach to achieve different results, revise the LEA plan to include more specific information about the professional development that will be provided to support improvements.

Standard Partially Implemented

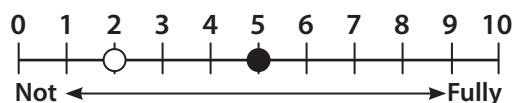February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 5

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        |--|--○--|--|--●--|--|--|--|--|
        Not ◄                    ►Fully
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6.1 Data Management/Student Information Systems

Legal Standard

The LEA assigns and maintains Statewide Student Identifiers and maintains all data to be reported to the California 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)

Sources and Documentation

1. Interviews with district staff

2. CALPADS status data

Summary of Third Comprehensive Review, March 2012

The CALPADS Fall 1 data was submitted and certified during the 2010-11 school year. Staff worked to prepare Fall 2 and Spring 1 data, but neither was certified for the 2010-11 school year. Submission for the 2011-12 school year was under way at the time of fieldwork.

Summary of Fourth Comprehensive Review, March 2013

All CALPADS submissions for the 2011-12 school year were completed and certified, including Fall 1, Fall 2, Spring, and End of Year 1-4. Fall CALPADS submissions and the OPUS submission were under way for the 2012-13 school year.

Findings

1. The district submitted and certified all CALPADS submissions during the during the 2011-12 school year, including Fall 1, Fall 2, Spring and End of Year 1-4. Staff reported some challenges with the Fall 2 submission for the charter school and the alternative school as well as the course completion data included in the end of year submission. Those challenges were common among local educational agencies during the 2011-12 school year because that was the first year those data were submitted to CALPADS.

2. Staff indicated that procedures for reporting CALPADS and OPUS data are defined and understood by the district and site staff involved in the submissions. Submissions for this school year are under way and are going well. Staff reported that the district consistently communicates with sites regarding the importance of submitting accurate and complete data to the state. The district held an Aeries support team meeting on October 3, 2012 to facilitate sharing of updates and practices among staff who use Aeries. This type of district leadership will help ensure the sustainability of practices that support timely and accurate CALPADS and OPUS submissions.

Recommendations for Recovery

The district should:

1. Continue efforts to collect, maintain and submit high quality CALPADS and OPUS data, including data audits and efforts to ensure that those coding information in the student information system understand and uniformly use the correct codes.

2. Submit Fall 2 data, determine any issues with the data, and work with school site staff and/or the human resources department to resolve any problems.

Standard Fully Implemented

February 2010 Initial Rating: 6

March 2011 Rating: 7

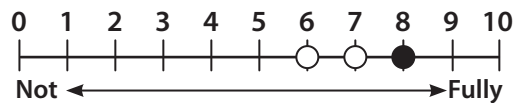March 2012 Rating: 7

March 2013 Rating: 8

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

Table of
Pupil Achievement Ratings

Pupil Achievement Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 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)	0	1	2	4
1.3 PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA's vision, mission, values, and priorities focus on the achievement and needs of all students with the goals of closing the achievement gap and helping all students meet their full potential.	1	1	1	3
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.	1	2	3	6
1.5 PROFESSIONAL STANDARD – PLANNING PROCESSES 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)	0	1	3	4
1.6 PROFESSIONAL STANDARD – PLANNING PROCESSES 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.	1	2	4	5
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)	2	2	3	6

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
1.9	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA holds teachers, site administrators, and LEA personnel accountable for student achievement through evaluations and professional development.	0	1	2	4
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)	1	2	3	5
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)	1	1	3	6
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.	2	2	3	4
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.	1	1	3	3
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)	1	2	2	4

Pupil Achievement Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
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).	2	3	4	5
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)	2	3	4	6
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	2	4	4
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.)	3	3	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	2	2	3
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)	1	2	2	4
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	2	3	3

Pupil Achievement Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
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.	1	2	2	3
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.	0	1	3	4
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, SBE 51226)	1	2	4	4
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.	2	3	3	4
4.4 PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY 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.	2	2	3	4
4.5 PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY 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.	1	1	2	5
4.8 PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY Principals and teachers in underperforming schools and/or in schools under mandated improvement programs are provided special training and support by the LEA. Improvement plans are monitored.	1	1	2	4

Pupil Achievement Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
4.10 PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY The LEA and school site administration monitor fidelity of program implementation in the delivery of content and instructional strategies.	0	1	2	6
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.	2	2	5	5
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.	0	0	1	4
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.	1	1	2	5
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.	2	2	2	5
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 Data System (CALPADS) and the Online Public Update for Schools (OPUS) necessary to comply with No Child Left Behind reporting requirements. (EC 60900(e)	6	7	7	8
Collective Average Rating	**1.37**	**1.87**	**2.87**	**4.50**

The collective average ratings for all years are based on the subset of priority standards used in this fourth comprehensive review.

Financial Management

1.1   Internal Control Environment

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. (State Audit Standard (SAS) 55, SAS 78, SAS 82: Treadway Commission)

Sources and Documentation:

1. Interview with the state administrator

2. Interview with the interim chief business official

3. Interviews with board members

4. Interviews with district administrators

5. Interviews with school site staff members

6. SafeSchools Training Assignment Compliance, November 6, 2012

7. Annual audit reports for the fiscal years ending June 30, 2009, June 30, 2010 and June 30, 2011

8. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district had made significant progress in updating its board policies, and a code of ethics had been adopted. However, communication to employees regarding the need for significant changes in the district's budget needed to be increased to make more progress toward establishing the desired environment of high integrity and ethical behavior.

Summary of Fourth Comprehensive Review, March 2013

Although the culture at the district has changed with the appointment of the new state administrator, the district has fallen behind in its efforts to educate its staff on the subject of ethics. The code of ethics policy was not distributed to all employees during this review period; it was provided only in new employee packets for teachers, and no ethics training occurred. The district has converted its internal fraud hotline to the WeTip hotline; however, many employees were unsure what could be reported through WeTip.

Findings

1. Interviews with district staff members indicated that the district is trying to improve its culture and, although it had previously included the code of ethics policy in the annual

information packets for all employees, the code of ethics policy was not included for 2012-13. Conversations about ethics are reportedly happening at the administrative level, but administrators have not been provided with the expectation that they deliver that information to their staff members. Many district staff members reported that they had received online ethics training; however, review of the modules completed through the SafeSchools Training reveal that no such module was offered and that staff members have confused diversity training with ethics training.

Although improving the ethical culture of an organization takes time and considerable effort, the process has been aided by the new state administrator. Many district staff reported that decisions are more equitable and they no longer feel a sense of intimidation and fear of retaliation. The new state administrator was described as providing a calm work environment, collaboration on district issues, and a clear understanding and consistent application of his standards. However, a great deal of work remains. The district's budget is not balanced, and there is a need to increase communication with employees regarding the need for specific changes. Improving the district's ethical values will require additional time, a consistent message and visible consequences to regain the eroded trust of some employees.

Board Bylaw (BB) 9270, Conflict of Interest, was adopted on August 10, 2011; BB 9005.3, Principles of Ethics, was adopted on January 13, 2010; Board Policies 4119.21, 4219.21, 4319.21, and Exhibit 4119.21, Professional Standards Code of Ethics, were adopted on September 8, 2010; and Exhibit 4219.21, Professional Standards, was adopted on April 20, 2011. The district includes the code of ethics in each new teacher packet; however, there is no indication that the employee is required to acknowledge receipt or review the policy and acknowledge their understanding of its contents. The district did not provide a new employee packet for classified personnel. Staff indicated that no formal verbal communication and/or training were provided during this review period regarding the district's ethical standards and the consequences of failing to adhere to them.

2. Some of the most common means of detecting fraud are employee reporting and anonymous tips. Typically, these methods are most effective when employees have access to a suggestion box or a tip line which allows individuals to either identify themselves or remain anonymous. The mere existence of such mechanisms and the attendant risk of discovery will deter some employees from acting in an unethical or illegal manner. The district has changed its means for reporting questionable activities from an internal hotline accessed through the district's main telephone number to a hotline associated with WeTip Inc., a separate entity that provides an anonymous method to report criminal activity. The district has displayed posters from WeTip on its campuses and in the reception area at the district office. Information is also prominently displayed on the district website's home page. Although many employees were aware of the WeTip hotline, some were unsure what could be reported via the hotline, and a few were unaware of its existence. When WeTip receives a tip, WeTip determines where to report the information; for example, theft it is reported to the police department and fire is reported to the fire department. If the tip is related to an ethics issue, it is reported to the district; however, the district has no written procedure indicating what to do when information is received, such as determining the level of investigation warranted,

deciding who should perform an investigation if needed, and reporting the results of those inquiries.

3. Fraud and the misuse of physical or cash assets occur when three factors converge: pressure or motive, opportunity, and rationalization or lack of integrity. These are known as the fraud triangle. When two of the three factors are present, the probability that fraud will occur increases. When all three factors are present, it is almost certain that fraud will occur.

    A common pressure or motive is the need for money. This factor continues to be present at the district because of the current economy and the reduction in employee compensation and benefits. The third factor, rationalization or lack of integrity, had reportedly been prevalent in prior review periods. While the perception of a double standard is decreasing, the district should not relax its vigilance on this issue because the inclination to right a previous wrong can be a part of the rationale for unethical or fraudulent behavior. The remaining fraud triangle factor is opportunity, which varies depending on an employee's assigned duties. The district's 2008-09, 2009-10 and 2010-11 audited financial statements identified various potential opportunities for fraud and presented them in the form of audit findings, some of which had been provided in 2007-08 and repeated in three subsequent years because the district did not adequately address them. Although the district continues to move toward more ethical behaviors and avoidance of fraud, it needs to ensure that proper internal controls are in place for each function.

4. Both the prior and current state administrator have continued to revise existing and adopt new board policies. These efforts have resulted in 305 policies having been updated as of this review compared to 214 at the time of the third comprehensive review. However, interviews indicated that the process used to review, revise and adopt policies under the prior state administrator did not consistently include the senior manager or administrator of each affected department. As a consequence, some policies may not adhere to current practice. For example, Board Policy 3100, Budget, adopted March 9, 2011 and revised January 1, 2012, continues to provide for a dual budget adoption process; however, the district uses the single budget adoption process. While the new state administrator has implemented an inclusive process in which the district's administrators review policies and provide input before they are adopted, policy revision, including the development of administrative regulations, will continue to require additional time.

5. In the district's audited financial statements for the fiscal years ending June 30, 2009, June 30, 2010 and June 30, 2011, the auditor's opinion included a paragraph regarding the district's ability to continue as a going concern as well as an audit finding expressing the auditor's apprehension about the district's ability to meet its financial obligations. These audit reports also included numerous audit findings related to deficiencies in processes and procedures, with some findings continuing from year to year without resolution.

Recommendations for Recovery

The district should:

1. Provide training regularly to all employees regarding the district's expectations and standards for ethical behavior and for upholding the board's policies and regulations, as well as the consequences for not adhering to these standards.

2. Include board policies and administrative regulations regarding ethics in the annual employee packets, and require each employee to acknowledge that they have received and reviewed the information.

3. Continue to inform employees, students, community members and board members of the district's WeTip hotline, and encourage its use to report any questionable activity. Establish written procedures for acting on information reported; a protocol for determining the level of investigation warranted; a means of determining who should perform an investigation if one is needed; and procedures for reporting the results of those inquiries.

4. Ensure that proper internal controls are in place for each required function.

5. Include the senior manager or administrator from each applicable district department in the process when adopting or revising board policy.

6. Form an active audit committee to provide the district with another level of oversight to help ensure proper operations and adequate follow-up to audit findings.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 2

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        |──○──●──|──|──|──|──|──|──|──|
        Not ◄─────────────────► Fully
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1.3   Internal Control Environment

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)

Sources and Documentation

1. Interview with the state administrator

2. Interview with the interim chief business official

3. Interviews with district and school site staff members

4. Employment agreement between the district and the chief business official (CBO), May 1, 2012

5. Organizational chart, July 19, 2012

6. Annual audit reports for the fiscal years ending June 30, 2008, June 30, 2009, June 30, 2010 and June 30, 2011

Summary of Third Comprehensive Review, March 2012

The district had updated its organizational chart as of August 8, 2011; however, lines of authority appeared to be confusing to some employees, and others were unaware of who their direct supervisor was. The district continued to need more staff in the business office; only the chief business official (CBO) and fiscal services manager were processing all accounting and financial transactions.

Summary of Fourth Comprehensive Review, March 2013

Although the district has updated its organizational chart, some employees remain confused about their supervisor and employee relationships. In approximately six months, the district's business office has experienced the departure of an interim CBO, the hiring and resignation of a permanent CBO, and return of the interim CBO. The department has only 2.6 full-time equivalent (FTE) staff members, which makes it difficult to segregate duties; there were significant audit findings regarding this for fiscal year 2010-11.

Findings

1. The district provided FCMAT with an organizational chart dated July 19, 2012 that identifies all management and district support staff positions and their reporting structure. Lines of reporting and support are identified in the organizational structure; however, interviews revealed that some district employees were uncertain of their supervisor and employee relationships. One district employee was unsure who their supervisor was; one reported to two supervisors; one manager was unsure whether they supervise employees;

another believed that they supervise an employee, but the organizational chart does not indicate this; and another believed that their supervisor is different than what the organizational chart indicates.

2. Key components of effective internal controls include a definitive reporting structure and procedures to ensure that no one person is responsible for transactions from beginning to end. However, because of budget constraints, the district has not filled one of the fiscal services manager positions included on prior organizational charts but has instead chosen to split the assignment of the maintenance, operations, transportation, and facilities (MOTF) technician, assigning this position two days per week at the MOTF department and three days per week at the district office as a business office technician. The district will also initiate another executive search to replace the interim CBO, whom the district asked to return following the resignation of the permanent CBO, which was effective October 5, 2012, after approximately five months with the district. The interim CBO's departure date is unknown at this time.

    The CBO and the fiscal services manager continue to be responsible for most business department duties. This has resulted in a violation of internal control procedures. This issue was also included as a finding in the district's 2010-11, 2009-2010, 2008-2009 and 2007-2008 audited financial statements (findings 2011-14, 2010-3, 2010-5, 2009-3, 2009-5, 2008-3, and 2008-5).

    This situation is exacerbated by the fact that the department has had significant turnover and has been restructured three times in three years. This continues to leave the district in the untenable position of having lost much of its institutional knowledge regarding financial matters without the opportunity to transfer that knowledge or train new employees.

3. During the second comprehensive review, district staff members indicated that there had been some irregularities regarding ASB activities. In response to those concerns, the prior state administrator removed ASB functions from the school sites and transferred them to the district office. However, because processes and procedures were not in place at the time of the transfer, there was significant confusion about how to proceed with ASB and club transactions. With only two employees in the business department at that time, this added to the burden of day-to-day business functions. Internal control principles were also compromised because these two employees were processing the transactions and entering them into the accounting records. Sites also reported difficulties processing their transactions because of inadequate information on the ASB accounts.

4. The 2010-11 audited financial statements had four findings regarding ASB funds, including a finding that reduced the auditor's opinion to qualified since the auditor could not determine whether the ASB funds were fairly stated because of the uncertainty of the ASB cash balances and other audit findings associated with deficiencies in cash disbursements, cash receipts and internal controls. During the third and current review periods, school sites have reported that transactions are proceeding more smoothly but take more time to process than when ASB functions were at the sites. The depth of the current audit finding reflects the severity of the issue.

Recommendations for Recovery

The district should:

1. Ensure that lines of reporting are clearly defined on the organizational chart, and distribute the chart to all employees to help ensure that each employee knows who they report to and who is in the chain of command above their supervisor.

2. Increase its efforts to immediately fill positions in the business services department.

3. Provide newly hired business department staff with intensive training to ensure the continuity of institutional knowledge regarding the district's finances. This training should be provided by the current staff if possible, but the district may need to call upon the Monterey County Office of Education or other professionals for assistance if the current employees are no longer available.

4. Immediately prepare written policies and procedures for processing ASB transactions at the district office, and provide training to school site personnel.

5. As funding permits, consider re-establishing a part-time ASB clerk position at each of its two comprehensive high schools, possibly splitting one full-time position between the two sites. If this is done, provide training to the new clerk and continue to provide training to the advisors and administrators responsible for ASB funds.

Standard Partially Implemented

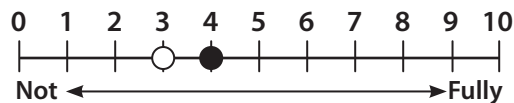February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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  0   1   2   3   4   5   6   7   8   9   10
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      Not ◄─────────────────► Fully
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2.1   Inter- and Intradepartmental Communications

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.

Sources and Documentation

1. Interviews with the state administrator and the interim chief business official

2. Interviews with district and school site staff members

3. District website

4. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

Site and department staff members indicated that a good working relationship had been established with the business department and that it provided information in a timely manner. However, more training regarding business procedures and budget functions needed to be provided to applicable site and department staff members. In addition, executive cabinet meetings needed to be conducted weekly to ensure that all pertinent district information was shared between the state administrator, CBO and assistant superintendent. The district had not developed desk manuals for business office positions.

Summary of Fourth Comprehensive Review, March 2013

Site and department staff have good working relationships with the business department, and the department provides timely information. However, site and department staff need more training in business procedures and budget functions, and all department managers should have online access to the district's financial management system (FMS). An executive cabinet has been formed and meets weekly. The district has not shared its 2010-11 audit findings with staff members or developed desk manuals for business office positions.

Findings

1. Communication between the business department and the school sites and other district departments continues to be timely, and staff reported that a good working relationship exists between the parties. However, site administrators, department managers and staff responsible for budget and purchasing functions have been given minimal formal training in these areas, and some indicated that no training was provided during this review period. Several staff members are relatively new to their positions and need additional

verbal and written training regarding budget development, account coding and business procedures.

2. The cabinet meets twice per month. Cabinet members include the state administrator, CBO, director of educational services, human resources administrator, department managers and the executive assistant to the state administrator. In addition, the administrative council meets every two weeks. Members include the state administrator, CBO, director of educational services, human resources administrator, executive assistant, special education director, school principals, and assistant principals. Some changes in business processes and procedures are discussed at these meetings.

   The district has formed an executive cabinet. Members include the state administrator, CBO, director of educational services, human resources administrator, and the executive assistant to the state administrator. Meetings are held weekly and provide an opportunity for participants to discuss district issues and to ensure that decisions made by the state administrator have been communicated to staff members responsible for their implementation.

   Rather than including a letter to employees with their monthly paychecks, since September 1, 2012 the state administrator has posted monthly to his blog, providing information about some of the district's significant issues and board actions. Employees are informed by email when a new blog post is created.

3. The state controller's office began conducting the district's independent audit in fiscal year 2010-11. The audit report for fiscal year 2010-11 included 28 findings, and there were six audit findings from the fiscal year 2009-10 report for which the recommendations remained either unimplemented or partially implemented. There were 28 audit findings for fiscal year 2010-11, which was a significant increase from eight in the prior year. Staff indicated that the 2010-11 audit findings had not yet been shared with applicable staff members because the district has filed an appeal to the state regarding many of the findings. Annual audit findings should be shared as soon as the audit is received to help ensure that necessary procedures are corrected and staff are held accountable for following them. The fiscal year 2011-12 audit was in process during FCMAT's fieldwork.

4. School sites have online access to the district's FMS and can review account line budgets and print financial reports; however, not all department managers have this access. If a budget transfer is needed, site and department personnel call or email the business office to request one. Giving online access to all department managers and implementing an electronic budget transfer form and training staff in its use would help provide uniformity and better internal controls.

5. The business department lacks desk manuals with step-by-step procedures for job duties. Desk manuals are important to ensure proper internal controls, the transfer of institutional knowledge, and a better understanding of the responsibilities of each position. This is particularly relevant in the district's case because there has been significant turnover in

business office positions, and the district anticipates hiring a new CBO during fiscal year 2012-13.

Recommendations for Recovery

The district should:

1. Provide additional verbal and written training to site and department staff regarding budget development, proper business procedures, account coding and the use of FMS.

2. Continue to provide verbal and formal written communications among departments, particularly regarding business procedures and internal controls.

3. Continue to conduct executive cabinet, cabinet and administrative council meetings to ensure that all pertinent information is shared between the parties.

4. Continue posting blog entries and informing staff of the state administrator's monthly blog, and consider posting a link to the blog on the district's website.

5. Share annual audit findings with site and department staff each year following completion of the audit. Implement processes and procedures to correct each finding, and hold staff accountable for following procedures.

6. Provide all department managers with online access to FMS.

7. Develop a budget transfer form and make it available electronically to site and department managers.

8. Develop a desk manual for each position in the business department, and ensure that each employee includes in their desk manual step-by-step procedures for all assigned duties.
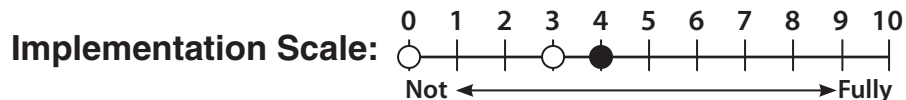
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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         Not <----------------> Fully
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2.3   Inter- and Intradepartmental Communications

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.

Sources and Documentation

1. Interviews with the state administrator and the interim chief business official

2. Interviews with board members

3. Board meeting agendas and minutes

4. Adoption budget report, 2012-13

5. First, second and third interim reports, 2011-12

6. Unaudited actuals report, 2011-12

7. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

Purchase orders and vendor and payroll warrant registers had not been provided at regular monthly board meetings since October 2010. The chief business official provided a board training session regarding the budget on March 22, 2011, and it was recommended that the district continue to provide budget training to board members to increase their knowledge of the district's finances. Applicable district administrators and managers needed to review proposed board policies and administrative regulations before placing the documents on the board agenda.

Summary of Fourth Comprehensive Review, March 2013

Purchase orders and vendor and payroll warrant registers were not included on the board agenda for approval or ratification. The chief business official provided information regarding budget development at a board study session on April 4, 2012, and should continue to provide board members with budget training. The state administrator has begun providing draft board policies and administrative regulations to administrators and managers for review before placing the documents on the board agenda.

Findings

1. Education Code Section 17604 requires that the governing board or state administrator approve or ratify all contracts, which includes purchase orders. However, board meeting

agendas did not include lists of the purchase orders and/or warrants. The district needs to ensure that purchase orders and contracts are presented for approval and that warrants, in summary form, are included for ratification on each regular board meeting agenda.

2. An FMS budget report and a cash flow report are included as an information item on the board agenda every month except those months that include a state-required budget report. In addition, at each state-required budget reporting period the CBO provides the board with a budget presentation that includes a narrative executive summary that contains a budget overview and multiyear financial projection assumptions. However, information regarding year-to-year budget trends, charts and graphs, and a simplified and more user-friendly budget summary spreadsheet are not provided.

3. On April 4, 2012 at a board study session the CBO provided information regarding the process for building the 2012-13 budget. Board members indicated that they continue to gain a better conceptual understanding of the budget and will benefit from continued training regarding the district's budget and finances.

4. The district continues to develop and/or update several board policies and administrative regulations, including those regarding business and noninstructional operations. The newly appointed state administrator indicated that draft policies and regulations are now provided to the appropriate administrator or manager for review before being included on the board agenda. This procedure should help prevent the adoption of policies and regulations that include errors. However, BP 3100, Budget, revised on January 11, 2012, prior to implementation of the new procedure, needs to be corrected because it states that the district uses a dual budget adoption process when it actually uses a single budget adoption process.

Recommendations for Recovery

The district should:

1. Ensure that each regular board meeting agenda includes the approval of purchase orders and contracts and ratification of warrants by the state administrator.

2. Continue to ensure that the board takes an active role in understanding the district's financial position.

3. At each reporting period, include in the budget presentation a simplified, user-friendly budget summary spreadsheet and charts and graphs depicting year-to-year trends in areas such as the following:

   • General fund revenues and expenditures

   • Enrollment and average daily attendance (ADA) history and projections

   • Net ending balances for both the unrestricted and restricted general fund

   • Net change in the ending balance/deficit spending for both the unrestricted and restricted general fund

- General fund contributions to special education and any other programs or funds that require a contribution from the unrestricted general fund

4. Schedule additional board training sessions regarding the district's budget to improve board members' understanding of the budget and of public education finance.

5. Revise BP 3100 to indicate a single budget adoption process.

6. Provide the draft board policies and administrative regulations to all applicable district administrators and managers for review and input before including them on the board agenda for first reading.

Standard Partially Implemented

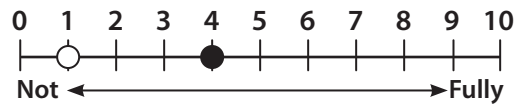February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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      |--○--|--|--●--|--|--|--|--|--|
       Not ◄                  ► Fully
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3.1 Staff Professional Development

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.

Sources and Documentation

1. Interviews with the interim chief business official and business office staff

2. District organizational chart, July 19, 2012

Summary of Third Comprehensive Review, March 2012

The business department consisted of a chief business official and two fiscal services manager positions; however, one of the fiscal services manager positions was vacant at the time of FCMAT's fieldwork. The district needed to develop and implement a professional development plan and ensure that business department employees were evaluated in a timely manner.

Summary of Fourth Comprehensive Review, March 2013

The business department consists of a chief business official, a fiscal services manager, and a part-time business office technician. The district has not developed and implemented a professional development plan for business department employees or ensured that each employee receives timely evaluations.

Findings

1. The district has changed the business department's staffing structure three times in the last three years. The organizational chart dated July 19, 2012 includes 2.6 FTE business department positions: a chief business official, a fiscal services manager, and a part-time business office technician, who was hired for the position in July 2012. At the time of FCMAT's fieldwork, the CBO position was filled by a former district CBO serving in an interim capacity, and the district was planning to advertise for a new CBO.

2. The district does not have a formal staff development plan for its business department positions. The district needs to immediately assess the experience and expertise of its current fiscal services manager and business office technician and implement a professional development plan for each individual. It is best practice to ensure that such a plan includes workshops, in-service events, cross-training opportunities, the time and financial resources required from employees and the district, and expected outcomes for each activity. Using a standard form to document the plan and reviewing the plan at least annually are also best practices.

3. No evidence was provided to indicate that business department employees have been evaluated during this review period. Routine and timely employee performance evaluations help leaders manage a school district effectively. They allow opportunities for managers and administrators to give positive feedback and coaching to further the district's major goals and objectives and ensure that sufficient documented evidence exists if performance is below acceptable standards so that corrective or disciplinary action can be taken when needed.

Recommendations for Recovery

The district should:

1. Fill the vacant CBO position with a permanent employee and consider increasing the business office technician position to full time.

2. Immediately assess the experience and expertise of each business department staff member and implement a professional development plan for each individual. Use a standard form to document each plan, and review the plans at least annually.

3. Ensure that business department employees are evaluated in a timely manner.

Standard Partially Implemented
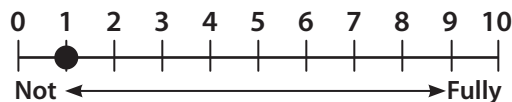
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

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          Not ◄────────────────────► Fully
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3.2   Staff Professional Development

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.

Sources and Documentation

1. Interviews with the interim chief business official and business office staff

2. Interviews with department and school site staff

Summary of Third Comprehensive Review, March 2012

The district had not developed a professional development plan for training site and department staff members about business topics. Although some staff members continued to indicate a need and a desire for additional training, no formal training was provided by the business department during the review period. Progress in this area was hampered by minimal staffing in the business department.

Summary of Fourth Comprehensive Review, March 2013

The district has not developed a professional development plan for training site and department staff members about business topics. Some staff members continue to indicate a need and a desire for additional training, and ASB and FMS training was provided to some employees during this review period. Progress in this area continues to be hampered by minimal staffing in the business department.

Findings

1. Some school site and department staff members indicated that they continue to need and desire additional training regarding business processes, account coding, and the capabilities of the FMS.

2. During this review period, the business department provided associated student body (ASB) training to school site staff and, in collaboration with the information technology director, provided FMS training to school site secretaries. The business department needs to provide school site and department staff with annual training that includes information regarding new processes, procedures and forms as well as a refresher in ongoing procedures that have not been followed as required. However, progress in this area is hampered because of minimal business department staffing.

3. The district does not have a formal professional development plan for business department staff to use to support and train school site and department staff members. Such a plan is needed, and when creating it the business department should ensure that

clerical and management staff members have an opportunity to provide input regarding the plan, including its goals, objectives and professional development activities. Effective professional development plans in the area of business will identify business-related training needs, cross-training opportunities, and the time and financial commitments required of the business office, school sites and departments. Expected outcomes for each activity will also be included. Effective plans also have a standard form to document the plan, and are reviewed at least annually.

Recommendations for Recovery

The district should:

1. Provide additional training regarding business processes, account coding, and FMS capabilities to school site and department staff members who work in these areas.

2. Provide site and department staff with annual training that includes information regarding business-related processes, procedures and forms.

3. Implement and review at least annually a professional development plan for school sites and departments that addresses business topics and functions. Use a standard form to document the plan.

Standard Partially Implemented
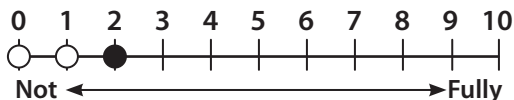
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 2

Implementation Scale:

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5.1   Budget Development Process

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with board members

3. 2012-13 adopted budget report to the board

4. 2011-12 first, second and third interim budget reports to the board

5. 2011-12 unaudited actuals financial report to the board

6. Revenue and expenditure reports provided to the board

7. Monthly cash flow reports provided to the board

8. Board meeting minutes

9. April 4, 2012 board budget study session materials

10. Matrix of CSBA Masters in Governance module completion as of October 8, 2012

Summary of Third Comprehensive Review, March 2012

The district continued to provide the board with training in the area of budget development and had expanded those efforts to include the instructional and student achievement areas. Budget reports included executive summaries. However, the governing board had allowed their Masters in Governance training through the California School Boards Association (CSBA) to lapse, and the board continued to struggle with the very complex area of school finance and budgets as well as the link between the budget and student achievement.

Summary of Fourth Comprehensive Review, March 2013

The district continues to provide monthly budget and cash flow reports to the board, but these recently returned to including actuals only rather than both actuals and projections. Multiple board members have asked more in-depth questions regarding the budget. However, the district's continued structural deficit and statements in its executive summary for the 2011-12 third interim report and its 2012-13 adopted budget indicate that unless it eliminates deficit spending it may need an additional loan.

Findings

1. The district has continued its efforts to help increase the board's understanding of the budget and knowledge of the district's cash flow requirements. These measures include the following:

    *   With the exception of months in which other financial information is presented, such as interim reports or unaudited actuals, a monthly budget report continues to be presented. This document is generated from FMS and shows the approved budget, working budget, amounts expended during the month and year to date, encumbrances, and unencumbered balance.

    *   With the exception of months in which other financial information is presented, such as interim reports or unaudited actuals, a monthly cash flow report continues to be presented to the board. This document has changed during this review period. At first reports were presented as they had been in the past, as an FMS-generated document showing cash inflows and outflows by major object code for each month to date; however, it did not show the projected amounts to year end, which would provide the board and the community with the district's cash flow expectations and allow them to see the full impact of budget decisions. The document presented at the November 16, 2011 board meeting changed to include both actual data through the prior month and projections for the upcoming months through June. At the November 13, 2012 board meeting the information reverted back to the FMS-generated documents that do not include projected amounts to year end.

    *   A board budget and fiscal study session provided by the chief business official on April 4, 2012.

    *   Two board study sessions regarding the communication plan on September 26 and October 26, 2011, led by the prior state administrator; a board study session on community relations and an update on the communication plan on April 4, 2012, led by the prior state administrator; a board study session covering math, human resources, vision and mission statement on February 22, 2012 (the leader for this workshop was not named); a board study session on educational topics and updates on May 23, 2012, led by the assistant superintendent of human resources and educational services; a board study session on test scores on October 9, 2012, led by the new state administrator.

    *   One board governance workshop provided through CSBA on January 16, 2012.

    *   Graduation of one board member from CSBA's Masters in Governance program. One of the remaining four board members has completed all modules and is awaiting graduation; two need to complete three modules; and one needs to schedule two modules.

2. Improvement continues in the board's general understanding of the budget and in providing the board with information beyond the standardized account code structure (SACS) forms to help the board focus on the students' and the district's needs. At each financial reporting period the district continues to provide an executive summary that contains a discussion of the district's status and provides instruction on fiscal and budgeting concepts as well as an indication of what to expect in the future. However, additional information such as charts, graphs and an analysis of the variance between the prior report and the one being presented can help board members and the community

better understand school finance and the district's budget. These tools can also be used to provide year-to-year trends in key areas such as net ending balances; changes to revenues and expenditures; funds or programs that require a contribution from the general fund; and student enrollment and ADA. Consistency in the information provided is essential to prevent confusion, because the district lacks the prior institutional knowledge needed to answer most questions regarding changes going back to previous fiscal years (such as those within the SACS criteria and standards reports). This highlights the need for continuity in administrative personnel and the need for additional financial analysis to help bridge the gaps in knowledge when there are changes in personnel.

The tools discussed above are fundamental to helping the board understand revenue and expenditure standards and the formulas needed to maintain the district's solvency while also focusing on students' and the district's needs.

3. A comparison of the 2010-11 unaudited actuals to the 2011-12 unaudited actuals for the general fund reveals the following:

- A decrease of $1,086,000 in total revenues primarily because of decreases in revenue limit funding, unrestricted state revenues and restricted local revenues

- A decrease of $866,000 in expenditures for salaries and benefits

- A decrease of $221,000 in books and supplies

- A decrease of $223,000 in capital outlay

- A decrease of $525,000 in contribution to restricted programs

Even though there were decreases in revenues and the district reduced its expenditures more than the revenue reductions, deficit spending has not been eliminated. The district continues to project deficit spending in fiscal years 2012-13, 2013-14 and 2014-15 as well as a negative general fund ending balance of $1,139,422 for fiscal year 2014-15. In addition, this projection includes revenue from the state loan in fiscal years 2012-13 and 2013-14 and those funds will be fully used prior to fiscal year 2014-15.

For fiscal year 2014-15, the executive summary in the 2012-13 adopted budget states "[i]n 2014-15, due to the continuing structural deficit, the ending balance is projected to be ($1,365,437), not meeting its 3% reserve and *possibly needing an additional loan*." (Emphasis added).] This statement was also included in the district's 2011-12 third interim report.

Collective bargaining agreements with certificated and classified employees do not provide for reopening salary and benefit negotiations, except by mutual agreement, until fiscal years 2013-14 and 2014-15, respectively. The district made public its bargaining proposals at its April 17, 2012 board meeting and included 20 articles and five appendices for review in the certificated contract and 14 articles and six appendices to be reviewed in the classified contract. The articles included salary and health benefits for both units.

4. Board members are continuing to demonstrate a greater knowledge of the financial difficulties the district faces and, in contrast to the past when one board member would take the lead role regarding financial matters, now multiple board members ask in-depth

questions regarding the budget and cash flow. Board members continue to meet with the district's CBO to obtain answers to their budget questions.

5. The entire board has not yet fully connected their understanding of finance with student achievement and the need to maintain the district's fiscal solvency. One board member has recently come to understand that the funds used to repay the state loan will be unavailable to pay for items for the district's students. To assist them in this regard, staff members from additional district departments such as human resources and student services have provided board workshops and presentations in their areas of responsibility. These efforts will need to continue.

Recommendations for Recovery

The district should:

1. Continue board members' participation in training sessions regarding specific aspects of public school finance that will support them in carrying out their responsibilities as stewards of public funds and help improve student performance.

2. Provide the board with monthly cash flow reports that contain projections through year end.

3. Provide the board with additional information at each reporting cycle to augment SACS forms and to give board members financial information in a format that is easier to understand.

4. Continue to review the budget to identify revenue increases or additional expenditure reductions to eliminate ongoing deficit spending and the negative general fund ending balance projected for fiscal year 2014-15.

5. Encourage board members to complete the CSBA's Masters in Governance program.

6. Continue to provide supplemental trainings from district staff members to ensure that the board can effectively apply the concepts learned to local issues and circumstances that focus on students' and the district's needs.

Standard Partially Implemented
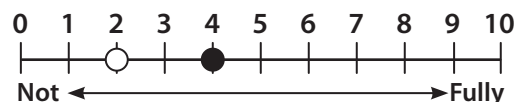
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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      Not ◄─────────────────► Fully
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5.2 Budget Development Process

Professional Standard

The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with school site administrators

3. Interviews with department directors and managers

4. Interviews with board members

5. Annual audit reports for the fiscal years ending June 30, 2009, June 30, 2010 and June 30, 2011

6. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district obtained little input from sites, departments or the board in the development of the 2011-12 budget; however, on August 18, 2011 the district held its first meeting of the newly formed budget advisory committee.

Summary of Fourth Comprehensive Review, March 2013

The district continues to obtain little input from sites, departments or the board in developing the 2012-13 budget, and the audited financial reports continue to include a finding regarding the district's ability to continue as a going concern. The district has had two additional meetings of its budget advisory committee; however, attendance has declined: its last meeting included only the state administrator, the CBO and a library clerk.

Findings

1. Staff reported that the 2012-13 budget was developed primarily by the state administrator and CBO. As in the past, involvement of site and department managers was minimal. However, interviews indicated that the new state administrator intends to increase site and department participation in developing the budget for fiscal year 2013-14. The departure of the current interim CBO is planned, and it is not known how a new CBO will approach the development of the 2013-14 budget, which will have begun in November of 2012. However, if the new CBO enlists the participation of site administrators and department heads as recommended by FCMAT, it will be a new experience for many managers and administrators and will require that the business office provide some in-depth training and develop procedures and forms to help staff better understand budget development.

2. In the past, staff did not seek the board's input during budget development but presented the board with allocations of resources for approval at various times during budget development. Board members reported that this was not the process for the 2012-13 budget, and allocations were not presented to them. Although it is not known whether board input is planned for 2013-14 budget development, the district has begun to include community members and district administrators in budget development through its budget advisory committee.

3. The district's audited financial statements for the fiscal year ending June 30, 2011 continue to include a finding regarding the district's ability to continue as a going concern. It is finding number 2011-01 and is a repetition of those contained in audited financial reports from June 30, 2010, June 30, 2009 and June 30, 2008 and numbered 2010-1, 2009-1, and 2008-1, respectively. The findings for the years ending June 30, 2008, 2009 and 2010 all state that the district had formed a budget committee; however, this committee did not first meet until August 18, 2011. The sign-in sheet for the August 2011 meeting indicated nine people in attendance, including the district's state administrator, the CBO and a site administrator. According to the affiliations listed by each name on the sign-in sheet, the remaining six individuals in attendance were representatives of the community, including students, and the majority were representatives of the Greenfield area. Two additional meetings were conducted on November 10, 2011 and June 6, 2012. The November meeting sign-in sheet showed six people in attendance including the state administrator, a site administrator, library clerk, two students and a parent, with the majority of representation from the Greenfield area. The sign-in sheet for the June meeting showed three people in attendance: the state administrator, the CBO and the library clerk. Attendance declined with each meeting, with the last meeting attended by no one outside of district administration or employees. The information provided did not include any indication of when the next meeting will occur.

Recommendations for Recovery

The district should:

1. Provide budget training to all administrators and managers who are to be included in budget development for fiscal year 2013-14. Training should include the following:

   - Budget worksheets that show the total amount available per resource; staffing currently allocated to the resource with lists of employee names, hours worked, and stipends paid; time sheet positions normally attached to the resource; the indirect costs to be charged to the program; and the remaining unallocated amount for sites and departments to budget.

   - Information regarding account coding, including how to read the code and how those codes translate into expenditure categories by object.

   - Detailed information regarding how each funding source is to be used. School Services of California's (SSC's) CAT Wizard could be an effective tool to provide this information.

- Salary and benefit calculation spreadsheets that will allow school principals and department heads to gain hands-on experience with how a position is budgeted and how the budget is affected by statutory and health and welfare benefits. This concept can be one of the largest hurdles in understanding budgeting. Many managers understand the idea of paying a salary but forget that there are benefits attached to the salary, including State Teachers' Retirement System (STRS) or Public Employees' Retirement System (PERS), social security, Medicare, workers' compensation insurance, unemployment insurance, and health and welfare. In many districts the business office uses a spreadsheet that can assist in this calculation.

- Information regarding the district's goals and priorities to be considered in budget development.

- Information regarding indirect costs, including what they are, how they are calculated, and the necessity for them to be paid from each resource as legally allowed.

These trainings should move the district toward a more transparent and inclusionary budget development process. However, site administrators and department heads should be reminded that with the opportunity to become a part of the budget process comes the responsibility of adhering to the plan that they develop.

2. Continue to include input from the governing board and the community in budget development.

3. Ensure that the budget advisory committee meets more regularly than twice a fiscal year and tries to include a broader spectrum of community interests including, but not limited to, representatives from the board, district administration, school administration, district departments, employee bargaining units, parents, students, and the non-parent community.
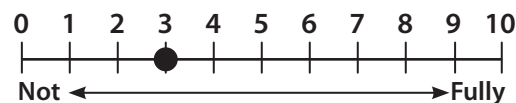
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

5.3   Budget Development Process

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. A budget calendar contains statutory due dates and major budget development milestones.

Sources and Documentation

1. Interviews with the interim chief business official and the fiscal services manager

2. Adoption budget report, 2012-13

3. Unaudited actuals financial reports, 2010-11 and 2011-12

4. 2011-12 third interim budget reports to the board

5. Budget calendar

6. Certificated and classified employee collective bargaining agreements

7. Memoranda of understanding entered into with bargaining units

8. Contract proposals to district bargaining units for 2013-14, April 17, 2012

9. Financial summary reports, 2012-13

10. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district had recently adopted policies and regulations regarding budget development; however, the governing board was not involved in the 2011-12 budget development process. The district had received the resignation of a board member who was well versed in district financial issues and was expected to experience the departure of its current CBO in the near future, creating uncertainty about the budget development process for fiscal year 2012-13. The district's budget calendar continued to need further revision.

Summary of Fourth Comprehensive Review, March 2013

The board continues to be uninvolved in developing the district's budget but has been provided one study session regarding budget and fiscal matters. Carryover continues to be excluded from the budget until it has been quantified, and the application of the district's indirect cost rate continues to need further attention as does its marked decrease between 2011-12 and 2012-13.

Findings

1. The district continued to provide training to the board in budget and fiscal matters, including conducting a study session on April 4, 2012 regarding budget development. However, the district did not involve the board in developing the 2012-13 budget. With the upcoming departure of the interim CBO, it is not known how the board will be involved in developing the 2013-14 budget. Although the district adopted board policies and regulations regarding the budget and budget development, no evidence was provided of processes or strategic planning objectives used during the budget development for fiscal year 2012-13. There is also no evidence that the district had developed or used any list of priorities for budget resource allocations and expenditure reductions for its 2012-13 budget.

2. As discussed in standard 5.1 above, the district has made some progress in expenditure reductions but continues to report a structural deficit, and the executive summaries of its 2011-12 third interim report and 2012-13 adopted budget raise the possibility that it will need an additional state loan.

3. Carryover continues to be incorporated into the budget at preparation of the first interim report. Industry best practice is to include carryover in the budget only after it has been definitively quantified, which occurs at the completion of the unaudited actuals but before issuance of the first interim report.

4. Exhibit A of Form ICR, which is included in the district's 2011-12 unaudited actuals, tracks the application of the district's indirect cost rate to programs. This form indicates that the district's approved individual indirect cost rate was 10.78% for 2011-12. The indirect rates used in programs varied from 3.0% to 10.78%. The allowable rates vary between programs, some of which have a set rate. For example, the rate for Title III is 2% and the rate for Economic Impact Aid is 3%. Other programs allow the district to charge indirect costs at its individual rate, while some, such as vocational education, have a maximum of either the district's rate or 5%, whichever is greater. The district's approved individual indirect cost rate for fiscal year 2012-13 is 4.10%, which is a 62% decrease from the prior fiscal year. Charging each restricted program the appropriate indirect cost rate helps the unrestricted side of the budget defray the costs of services restricted programs use and helps show the total cost of each program. A review of the district's 2011-12 estimated actuals revealed that a categorical program, Economic Impact Aid, included an indirect rate higher than allowed by law. The district's financial summary reports for fiscal year 2011-12 indicate that the budgets for some categorical programs do not include indirect costs, while others include rates that are lower than or more than those allowed by law.

5. The district's budget calendar includes some critical tasks, the staff member or department assigned to complete the task, and the month in which the task will take place. The calendar does not identify which budget cycle it was designed for, does not include all critical tasks, does not define the dates so that specific deadlines are recognizable, and remains relatively unchanged since the third comprehensive review. For example, March 15 is the deadline for sending preliminary layoff notices to certificated staff and for presenting the second interim report to the board, and

December 15 is the deadline for presenting the first interim report to the board; however, the calendar includes neither date. Statutory deadlines are particularly important, such as the deadline for making the proposed budget available for public inspection and for presenting the budget to the board. The budget calendar needs to include all of the applicable tasks and the date for completion.

Recommendations for Recovery

The district should:

1. Ensure that the board has an opportunity to provide input regarding budget development, strategic planning objectives, and priorities for resource allocations and expenditure reductions. This should include developing and approving a list of priorities for budget reductions so that the administration understands these priorities and how to implement them during budget development.

2. Continue to prohibit the inclusion of carryover assumptions or estimates during budget development without prior approval from the state administrator.

3. Budget and charge the full allowable indirect cost rate for each program.

4. Investigate the decrease in the indirect cost rate for the fiscal year 2012-13.

5. Revise the budget calendar to include statutory deadlines for all required budget development tasks so that each staff member is aware of deadlines and meets them. Ensure that the budget calendar includes all critical tasks, indicates which staff member will complete them, and provides deadlines for completion.

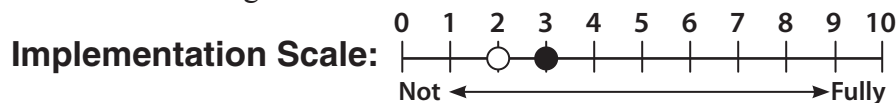## Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

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     0  1  2  3  4  5  6  7  8  9  10
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        Not ◄─────────────────► Fully
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5.4   Budget Development Process

Professional Standard

The LEA has policies to facilitate development of a budget that is understandable, meaningful, reflective of the LEA's priorities, and balanced in terms of revenues and expenditures. 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.

Sources and Documentation

1. Interviews with the interim chief business official and the fiscal services manager

2. Interviews with board members

3. Adoption budget report, 2012-13

4. Unaudited actuals financial reports, 2010-11 and 2011-12

5. Monterey County Office of Education budget review letter, 2012-13 adopted budget

6. 2012-13 Budget Report, December 2, 2012

7. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

Although board policies and regulations regarding budgeting and budget development were adopted in March 2011 and staff continued to use industry-standard techniques to estimate revenue, the district had not developed a balanced budget, used staffing ratios, included sites and departments in the budget development process, or produced revenue allocation worksheets. Restricted revenues continued to be underused, and the county office continued to express concern over operating deficits. However, under SB 130, the district was not required to build or maintain required reserve levels until fiscal solvency is restored.

Summary of Fourth Comprehensive Review, March 2013

The district has regressed in this standard. Except for using the 35-to-1 ratio for teacher staffing and a $90 per ADA allocation to the sites for discretionary funding, there has been no use of staffing formulas or budget allocations to departments. Budget worksheets were not used to communicate funding allocations, and the district's budget remains unbalanced.

Findings

1. On January 11, 2012, the district revised BP 3100, setting forth policies and regulations for its budget and budget development processes. A review of revised BP 3100 indicated

that the policy continues to include an annual dual budget adoption process. The district's 2012-13 and prior years' annual budget reports indicate a single budget adoption process. District staff indicated that department staff were not always included in board policy adoption and revisions in the past, which can lead to such inaccuracies.

2. Department managers and site administrators indicated that there is inconsistency in the extent to which sites and departments are involved in budget development. Some sites and departments had no input regarding their 2012-13 budget; others had conversations with the CBO. No worksheets were provided to sites or departments to give them information regarding how their budgets were calculated.

    The interim CBO believes that sites have been provided with a discretionary budget of $90 per P-2 ADA; however, is not certain if that number was changed during the permanent CBO's tenure. The sites control how those dollars are budgeted and expended. Other revenue sources are allocated to sites; however, because sites do not have authority over how the funding is spent, they do not receive information on the allocation method. The district was unable to provide its worksheets from SSC's RevLim revenue limit software or worksheets showing funding allocation formulas.

3. The district's multiyear financial projection (MYFP) and budget assumptions contained in its 2012-13 adoption budget indicated the following:

    *   The state trigger cuts were continued at $441 per ADA in fiscal years 2013-14 and 2014-15 rather than increasing the annual amount by 2.5% and 2.7%, respectively as indicated in SSC's 2012-13 May Revision Dartboard.

    *   P-2 ADA would remain static in fiscal year 2014-15. However, the district has been in declining enrollment since 2007-08 at an average rate of 2.5% per year.

    *   The MYFP's assumptions were minimal and did not include items such as the following:

        *   Per-ADA amounts used in projecting lottery funding

        *   Effects on federal funding, such as the projected 0.8% increase in Title I funding

        *   Effects of the deficit on state program funding

        *   Rates used for statutory benefit items such as PERS, workers' compensation and state unemployment insurance.

4. District staff did not use revenue worksheets to develop the 2012-13 budget, but provided a copy of their financial summary reports for 2012-13, dated December 2, 2012, showing the working budget. Applying the SSC May Revision Dartboard and information posted by the California Department of Education (CDE) when the budget was developed revealed some deviations, including the following:

    *   Title I, Basic Grants is budgeted at $406,147, but information posted by the CDE at the time of budget development indicates a total apportionment of $383,940 for

2011-12. This federal program was anticipated to increase by 0.8% over the 2011-12 amount, to $387,012, at the time of budget adoption.

- The Title III, LEP (Limited English Proficiency) program is budgeted at $71,000, but information posted by the CDE at the time of budget development indicates a total apportionment of $77,472 for 2011-12. This federal program was expected to receive the same funding in 2012-13 as in 2011-12.

- Mandated cost reimbursements were budgeted at $69,361. Although information available through SSC's May Revise workshop indicates that proposed funding was $28 per prior year ADA, the information states, "For operational purposes, continue the best practice of budgeting zero dollars in 2012-13 and future years."

5. The executive summary attached to the 2012-13 budget states, "[t]he Cafeteria fund is projecting to be self-sufficient in the 2012-13 year." However, an inspection of the cafeteria budget reveals that revenues have been reduced by 2.6% while supplies (primarily the expense for the food served) and services and other operating expenditures have been reduced by 39.9% and 50.9%, respectively. The reduction of revenue should typically parallel a reduction in these expenditures. The fund is unlikely to meet its self-sufficiency goal; rather, it is likely to require a contribution from the unrestricted general fund in the current year.

6. A comparison of the 2010-11 and 2011-12 Forms CAT revealed the following:

- Some ending balances or carryover amounts in the 2010-11 Form CAT were not the same as the beginning balances in the 2011-12 Form CAT, which can cause confusion over which are the correct numbers. Examples include Title III - LEP, Title II – Part A, and Title II – Part D.

- Several resources had been completely used; however, the carryover amounts or fund balances for the following programs increased from 2010-11 to 2011-12:

  - Title I increased by $125,566

  - Individuals with Disabilities Education Act (IDEA), Special Education increased by $89,765

  - Carl Perkins Vocational Program increased by $2,938

  - Title II, Part A increased by $2,335

  - Title III increased by $7,953

  - Lottery – Prop 20 increased by $42,523

  - Economic Impact Aid increased by $299,588

7. The district's human resources and business services department staff indicated that staffing formulas are not being used, other than the 35-to-1 staffing ratio in the collective bargaining agreement with certificated employees. Little input regarding staffing was sought from principals or department managers during budget development. Because the interim CBO is planning to leave the district, it is not known how a successor CBO will manage budget development or whether school sites and departments will be included in developing the 2013-14 budget.

8. The county office's October 1, 2012 budget review letter included the following comments and recommendations:

   - The district would be able to meet its financial obligations in 2012-13; however, they may not be able to meet those commitments in subsequent fiscal years without additional budget solutions.

   - The district is projected to deficit spend in 2012-13, 2013-14 and 2014-15. In the years 2013-14 and 2014-15, the district will need to revise the assumptions used and make decisions about areas that can be reduced to meet the AB 1200 requirements.

   - In 2014-15 the district will no longer have any state loan funds left, and the district has filed a negative certification at second interim for 2011-12.

Recommendations for Recovery

The district should:

1. Ensure that department staff are included in the development and revision of board policies and administrative regulations to ensure that current practices and procedures are incorporated.

2. Ensure that it includes sites and departments in budget development for fiscal year 2013-14.

3. Develop and use formulas to allocate staffing and funds to school sites and departments.

4. Communicate allocations to schools and departments using spreadsheets with allocation formulas that are based on criteria consistent with the funding source.

5. Use the most recent version of SSC's Dartboard and the most recent information posted by the CDE when developing and testing revenue estimates.

6. Develop estimates of revenues using industry-standard methods and tools such as SSC's Dartboard, Dynamic Budget Guide and RevLim software.

7. Ensure that the ending fund balances and carryover amounts included on the prior year's Form CAT are the same as the corresponding beginning balances posted on the current year's Form CAT.

8. Carefully analyze categorical funding to ensure that restricted funds are used whenever possible to avoid increasing restricted fund balances and carryover amounts without a specific plan for their use.

9. Judiciously review budgets to ensure that reductions in expenditures are reasonable and attainable.

10. Closely monitor revenues and expenditures to ensure that it is able to cease deficit spending and meet its financial obligations for the current and two subsequent fiscal years.
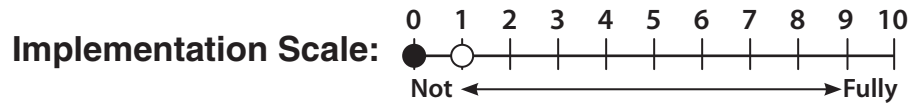
Standard Not Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 0

Implementation Scale:

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        Not ←              → Fully
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6.1   Budget Adoption, Reporting, and Audits

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))

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

3. Adoption budget report, 2012-13

4. Notice of Budget Adoption Public Hearing 2012-13, May 7, 2012

5. Monterey County Office of Education budget review letter, 2012-13 adopted budget

6. Draft Multi-Year Financial Recovery Plan 2012-13 to 2017-18, October 2012

7. Board meeting minutes

Summary of Third Comprehensive Review, March 2012

The district delivered its budget ahead of the July 1 deadline for the second year in a row.

Summary of Fourth Comprehensive Review, March 2013

For the third consecutive year, the district has delivered its budget prior to the July 1 statutory deadline, and it is drafting a five-year fiscal recovery plan.

Findings

1. The board held a public hearing and the state administrator adopted the district's 2012-13 budget at a special board meeting on June 27, 2012, within the statutory timelines established by California Education Code (EC) Section 42103. On October 1, 2012, the county office staff recommended that the state superintendent of public instruction approve the budget. County office staff indicated that their office received the 2012-13 budget before the July 1 deadline required by EC 42127. The October 1 letter noted that the county office could not find a record that the notice of public hearing had been published per Education Code Section 42103; however, the district was able to provide a copy of the notice of budget adoption public hearing 2012-13 which indicated that it had

been emailed to the county office on May 7, 2012. The October 1 letter also indicated the county's concern regarding the district's ability to meet its financial obligations in 2013-14 and 2014-15 without additional budget solutions. The letter additionally requested that the district provide an updated recovery plan and revised multiyear projection, including a specific plan to meet the state-recommended minimum reserve, as soon as possible. The district provided FCMAT with a copy of its draft multiyear fiscal recovery plan; however, it is not known when this document is scheduled for completion.

2. This is the third consecutive year in which the district's budget has been delivered to the county office before the statutory deadline. However, the county office's letter of October 1, 2012 was not within the time required by EC 42127(d), which requires that the county superintendent of schools approve, conditionally approve, or disapprove the budget for a school district on or before August 15.

3. Senate Bill (SB) 4 of the 2009-10 Third Extraordinary Session (SBX3 4) included several changes to law and provided local educational agencies (LEAs) with unprecedented budgeting flexibility. As a condition for receipt of Tier III flexibility funding under SBX3 4, an LEA must, at a regularly scheduled public hearing, take testimony from the public, discuss and approve or disapprove the proposed use of funding, and make explicit the purpose for which the funds will be used. The bill allows the public hearing to take place at the governing board meeting that includes the budget adoption. On October 8, 2011, Governor Jerry Brown signed AB 189, which requires that the public hearing required as a condition of receiving Tier III funding be held prior to and independent of the meeting in which the governing board adopts its budget. A review of the board meeting minutes for April 17, 2012 indicated that the district held the requisite public hearing regarding use of Tier III flexibility funding and included the explicit purposes for use of the Tier III funding for discussion.

Recommendations for Recovery

The district should:

1. Continue to submit its adopted budget to the county office on or before the deadlines established by EC 42103 and 42127.

2. Follow up with the county superintendent of schools to ensure that communication regarding the approval, conditional approval or disapproval of the district's budget occurs on or before August 15, pursuant to EC 42127(d).

3. Continue to ensure that the public hearing required by SBX3 4, as amended by AB 189, regarding receipt of flexibility funding for the 2013-14 budget year and subsequent years, is held prior to and independent of the annual public hearing for budget adoption and that the explicit purposes for use of the Tier III funding are included in the board's agenda and minutes.

Standard Fully Implemented

February 2010 Initial Rating: 2
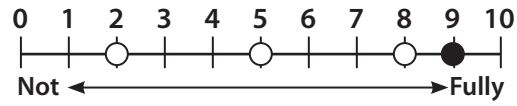
March 2011 Rating: 5

March 2012 Rating: 8

March 2013 Rating: 9

Implementation Scale:

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       Not ◄─────────────────────────► Fully
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6.2 Budget Adoption, Reporting, and Audits

Legal Standard

Revisions to expenditures based on the state budget are considered and adopted by the 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(2) and 42127(i)(4))

Sources and Documentation

1. Interview with the interim chief business official

2. School Services of California dartboards for 2012-13 May Revision and 2012-13 Adopted State Budget

3. Consolidated Application, July 14, 2012

4. Adoption budget report, 2012-13

5. Board meeting agendas

Summary of Third Comprehensive Review, March 2012

On June 30, 2011, Governor Jerry Brown signed Senate Bill 87 (Chapter 33, Statues of 2011), the Budget Act of 2011, which gave the state an on-time budget. The district provided its revised budget dated August 10, 2011, which complied with the 45-day requirement.

Summary of Fourth Comprehensive Review, March 2013

On June 27, 2012, Governor Jerry Brown approved AB 1464 (Chapter 21), the Budget Act of 2012, giving the state two consecutive years of on-time budgets. Therefore, changes to budgets as a result of the Budget Act of 2012 needed to be made available to the public on or before August 11, 2012. The district did not make revisions to its revenues or expenditures based on the Budget Act.

Findings

1. District staff were unable to provide FCMAT with documentation indicating revisions made to the district's budget based upon the approval of Assembly Bill (AB) 1464, the Budget Act of 2012. Board agendas for the July 19 and August 8, 2012 board meetings did not include presentation of this item. Because of the change in the district's CBO, it is not known why the necessary revisions were not made. A comparison of SSC's dartboards prepared for the 2012-13 May revision and 2012-13 adopted state budget shows that California lottery funding was projected to increase from $141.75 to $155 per ADA (including both the base and Proposition 20 funding) and that trigger cuts were increased by approximately $16 per ADA. A comparison of the Consolidated Application and the 2012-13 budget shows that funding for Title III, Part A should have decreased

from the $115,002.74 indicated in the budget to the $66,597 proposed entitlement shown in the Consolidated Application.

Recommendation for Recovery

The district should:

1. Revise and make available to the public its revenues and expenditures based on funding made available by the relevant year's state budget act.

Standard Partially Implemented

February 2010 Initial Rating: 2
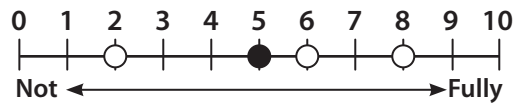
March 2011 Rating: 6

March 2012 Rating: 8

March 2013 Rating: 5

Implementation Scale:

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6.3 Budget Adoption, Reporting, and Audits

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

3. First, second and third interim budget reports, 2011-12

4. Monterey County Office of Education budget review letters regarding 2011-12 first, second and third interim budget reports

5. Board meeting minutes

Summary of Third Comprehensive Review, March 2012

The district continued to meet the deadlines for board meetings and for delivery of the third interim report as established by EC 42130 and EC 42131, respectively. The county office continued to express concerns in its review letters for the first and second interim reports. However, the county office did not issue a letter regarding the district's third interim report. District staff expressed concerns regarding the minimal oversight efforts provided by the county office and the CDE.

Summary of Fourth Comprehensive Review, March 2013

This review period marks the third year that the district was able to meet the reporting deadlines for its interim financial reports. The district and county office continue to agree on the district's negative budget certification. The county office expressed the same three concerns in its first and second interim review letters; however, the third interim letter was issued almost seven months after the district's submission of same. District staff continue to express concerns regarding the minimal oversight provided by the county office and the CDE.

Findings

1. The county office's review letter for the district's 2011-12 first interim budget report was dated March 8, 2012 but did not state the date the district submitted its report. However, county office staff indicated that the district submitted its budget reports on time. Education Code Section 42130 requires that this report describe the district's financial and budget status for the period ending October 31 and be approved by the district's governing board within 45 days after that. The district's December 13, 2011 governing

board meeting minutes indicate approval of the first interim report, and the meeting date complies with EC 42130.

The 2011-12 first interim budget review letter from the county office indicated that the district's budget included a negative certification and that the county office agreed with that assessment. The letter also commented on the district's "ongoing pattern of deficit spending" for fiscal years 2012-13 and 2013-14, the fact that the form CASH does not show a positive cash balance at the end of each month, and the fact that the reserve for economic uncertainties is met only by using state emergency loan funds.

2. The county office's review letter for the district's 2011-12 second interim budget report was dated June 22, 2012 but did not indicate the date the report was received. However, county office staff indicated that the district submitted its budget reports on time. Education Code Section 42130 requires that this report describe the district's financial and budget status for the period ending January 31 and be approved by the district's governing board within 45 days after that. Minutes of the district's March 12, 2012 governing board meeting indicate approval of the second interim report, in compliance with EC 42130.

The second interim budget review letter from the county office indicated that the district's budget included a negative certification and that the county office concurred with that assessment. The letter continued to note the district's "ongoing pattern of deficit spending" in fiscal years 2012-13 and 2013-14, the fact that form CASH does not show a positive cash balance at the end of each month, and the fact that the reserve for economic uncertainties is met only by using state emergency loan funds.

3. The district's 2011-12 first and second interim SACS reports incorrectly reported the use of funds held in fund 17 for inclusion in the multiyear projection. For 2011-12, these funds are overused because transfers from fund 17 are included in the general fund's other financing sources revenue line and the entire 2011-12 fund 17 balance is included in the multiyear projection. The subsequent years underuse the balance because they do not report the remaining available fund 17 ending fund balance moving forward. For example, if the 2011-12 fund 17 ending balance, after transfers to the general fund, is approximately $4.25 million and in 2012-13 there is a projected transfer of $1.5 million to the general fund, with no other projected revenues or expenditures, fund 17 would have an available estimated balance of $2.75 million for inclusion in the multiyear projection. The SACS multiyear projection form does not automatically provide for this calculation; it must be performed manually.

4. After inquiries from the district and FCMAT, the Monterey County Office of Education issued its review letter regarding the district's 2011-12 third interim report on December 26, 2012. The letter does not state when the county office received the district's third interim report. However, county office staff indicated that the district had delivered the report on May 29, 2012, which is prior to the June 1 deadline in Education Code Section 42131. Minutes of the district's June 13, 2012 board meeting include presentation of the third interim report; however, the report did not include a date of the state administrator's signature. The county office letter concurs with the district's

negative self-certification, recognizes that the district projects drawing down the final portion of the state loan during 2013-14, and comments on the need for the district to have a viable recovery plan as well as multiyear projections that will allow it to meet its minimum reserve requirements.

Education Code Section 42131 requires that the third interim report include projections of the district's fund and cash balances through June 30 for the period ending April 30 and be delivered to the county superintendent of schools no later than June 1. The district's 2011-12 third interim report's multiyear projections indicate deficit spending in the unrestricted general fund in the two subsequent fiscal years even with $1.5 million and $0.5 million in revenue from the state loan funds in 2012-13 and 2013-14, respectively. While the third interim report's multiyear projection divided the fund 17 ending fund balance over the three years, using the current year's available ending fund balance as described above would be less confusing and provide more accurate information.

The district and county office personnel still do not meet regularly. The county office's tardiness in issuing a letter regarding the district's third interim budget report after the district's submission of its 2012-13 budget and 2012-13 first interim report is a concern, particularly based on the reported infrequency of interactions between the county office and the district.

Recommendations for Recovery

The district should:

1. Continue to ensure that all budget reports are filed with the Monterey County Office of Education on time and that they include a plan to meet all financial criteria and standards for the district's budget as established by the state. This should include a plan to eliminate the district's structural budget deficit while maintaining reserves at required levels.

2. Review calculations for use of fund 17 in multiyear projections to avoid underuse and overuse.

3. Hold regular meetings with both the county office of education and the CDE.

Standard Partially Implemented

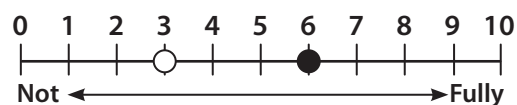February 2010 Initial Rating: 3

March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 6

Implementation Scale:

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7.2   Budget Monitoring

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with district office staff

3. Interviews with school site administrators and staff

4. Interviews with school site councils

5. Monthly budget reports presented to the board

6. Adoption budget report, 2012-13

Summary of Third Comprehensive Review, March 2012

The district had made little or no progress in this area since the March 2011 comprehensive review. Staff had been responsible for teaching themselves the online requisition system and had indicated their desire to receive additional training on this system as well as in the areas of account coding and categorical funding. This training would initially be a drain on the business office but was expected to result in fewer phone calls and emails.

Summary of Fourth Comprehensive Review, March 2013

The district continues to make little progress in this standard. Although staff reported that they are more comfortable using the FMS system to submit online requisitions and run reports, the Monterey County Office of Education, which provides the software, will be changing to the Escape system. This will likely result in sites and departments directing more requests and questions to the business office.

Findings

1. The FMS system's purchase requisition function recognizes encumbrances at the requisition level. Consequently, if there is not a sufficient amount in the budget line item, the order cannot progress past the user's attempt to produce a requisition.

    Staff reported that they were now becoming more comfortable with the online requisition system and had been given periodic training on both the online system and account

coding. Questions from staff continue to be directed to the CBO or the fiscal services manager. Additional training would reduce the number of calls to these employees, allowing them to focus on other tasks. This would ultimately provide smoother operations districtwide.

The county office is converting from the current FMS system to the Escape financial software system for both human resources and business functions. The business services conversion is scheduled to go live on July 1, 2013, and will present the district's business office with the challenge of retraining all of its online users and establishing a protocol to field questions regarding the new system while also providing services with minimal staff.

2. Staff indicated that they have access to the FMS system and are able to view accounts and print reports, and that they continue to become more proficient with these functions. If staff need assistance with these tasks, they can call or email the fiscal services manager or the CBO. However, this places an additional burden on the small number of staff members in the business office. Additional training could reduce the time all parties spend on these issues and give users a greater feeling of control and participation in budget monitoring.

3. The online purchase requisition system will not allow a purchase that exceeds the line item budget, thereby relieving the business office staff of the task of monitoring account line balances before placing orders. However, the fiscal services manager continues to be the only individual who gathers the information and prepares and enters all budget transfers into FMS. In many school districts, budget transfers are initiated by the site or department before being carried out in the business office.

4. District staff continue to present the board with a monthly budget update that identifies balances for revenues and expenditures by major object code. Staff members also present interim budget reports to the board as required by the Education Code; these reports include multiyear budget projections.

5. School site staff reported that they did not feel a need for additional assistance regarding categorical funding. However, they reported that they do not have input into their categorical budgets and do not know what their allocations are based on or how they are calculated. Both comprehensive high school site principals had just begun to work with their school site councils at the time of FCMAT's fieldwork. The business office acts as the final approver for categorical spending; however, sites need to be aware of the limitations of each categorical funding source and how funding sources can interact with one another. This information would be helpful to the principal and secretary at each site and would facilitate school site council discussions regarding funding.

Recommendations for Recovery

The district should:

1. Provide staff with additional training in the FMS online purchase requisition system and account coding as requested.

2. Provide staff with additional training in FMS to advance their proficiency in viewing accounts and running reports as requested.

3. Develop a plan to train users in the Escape software and provide the necessary resources to answer questions and address problems as they arise during the conversion.

4. Provide staff with instruction regarding how to compile the backup documentation needed to support budget transfers. After this instruction is provided, hold site and department staff accountable for monitoring their budgets using FMS or Escape.

5. Continue to present monthly budget reports to the governing board.

6. Provide school site staff with additional information regarding categorical funding, including the resources available and which expenditures are appropriate for each resource.

Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

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       Not ←                → Fully
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7.3   Budget Monitoring

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with district office staff

3. Interviews with department directors, supervisors and managers

4. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

5. Position control reports, 2012-13

6. Adoption budget report, 2012-13

7. Unaudited actuals report, 2011-12

8. Board meeting minutes

Summary of Third Comprehensive Review, March 2012

The district was hampered in improving its rating in this area because of the position control system used by the county office of education. Although the county office was working toward implementing a new financial software system that includes a new position control module, district implementation was not anticipated to begin until fiscal year 2013-14.

Summary of Fourth Comprehensive Review, March 2013

The district continues to be hampered in improving its rating for this standard because of the difficulties of the FMS position control system. However, the county office is implementing the Escape financial software system, which has a fully integrated position control module. Full implementation is anticipated on July 1, 2013.

Findings

1. Because of the difficulties with the system, the district has continued to use the FMS position control module only to maintain employee demographics. The county office acknowledges the difficulty of readily using this module, understands why the district has not adopted its use, and has initiated countywide implementation of the Escape financial software system, which includes a position control module. The human

resources modules, including position control, were scheduled to go live on January 1, 2013, with the business services modules being fully activated on July 1, 2013. District office personnel in both human resources and business services have begun training in the Escape software. As an alternative to using the current FMS software, and until the new Escape system is available, district business office staff continue to prepare Excel spreadsheets that contain all of the positions in the district, attach the account coding for each position, and use these documents to calculate the salary and benefit costs during budget development and interim reporting periods. Staff update the spreadsheets periodically throughout the year to show personnel and position changes, and the business services and human resources departments cross check information to minimize discrepancies in this manual system. However, a review of the spreadsheets indicated the following:

- The administrative position control spreadsheet showed:

    - Vacant position without a title

    - Filled positions without the employees' names or cost

    - Vacant positions without a cost

    - Positions without account codes

- None of the spreadsheets included amounts for the following:

    - Health and welfare payments made to retirees

    - Substitutes

    - Extra duty pay

    - Stipends, such as those paid for coaching

    - Vacation payouts

    - Estimated salary changes because of movement from one column to an-other on the salary schedule (known as column changes)

A reliable position control system establishes positions by site or department and helps prevent over- or under-budgeting by including all district-approved positions. In addition, a reliable position control system prevents a district from omitting from the budget routine annual expenses such as substitutes, extra duty pay, stipends, vacation payouts, and estimated salary changes when employees move from one column to the next on the salary schedule.

2. To be effective, a single position control system needs to be used and integrated with other financial modules such as budget and payroll. In addition, position control functions need to be separated to ensure proper internal controls. The controls should ensure that only board-authorized positions are entered into the system, that the human resources department hires only employees for authorized positions, and that payroll staff pay only employees hired for authorized positions. The proper separation of duties is a key factor in creating strong internal controls and a reliable position control system.

The following table provides a suggested distribution of labor between the business and human resources departments to help provide the necessary internal control structure for position control.

Task	Responsibility
Approve or authorize position	Governing board
Input approved position into position control, with estimated salary/budget. Each position is given a unique number.	Business or human resources department
Enter demographic data into the main demographic screen, including: Employee name Employee address Social Security number Credential Classification Salary schedule placement Annual review of employee assignments	Human resources department
Update employee benefits. Review and update employee work calendars.	Business or human resources department
Annually review and update salary schedules.	Business department
Account codes Budget development Budget projections Multiyear projections Salary projections	Business department

3. A review of the district's 2012-13 adoption budget indicates that salary and benefit expenditures are projected to be approximately $12.1 million, which is 84.5% of the district's general fund revenues (excluding the $1.5 million of the state loan that the district plans to draw down). This is a 0.7% increase from the 2011-12 adoption budget, which indicated that 83.8% of the general fund revenues were for salary and benefit expenditures. It is also a 3.3% increase over the 2011-12 unaudited actuals for which salaries and benefits totaled 81.2% of the general fund revenues. Even though the total projected expenditures for salaries and benefits have decreased by approximately $1.1 million since the 2011-12 unaudited actuals, the pattern of deficit spending continues and increases from one reporting period to the next. For example, the district's 2011-12 first interim report's multiyear projection estimated that general fund revenues would exceed expenditures by an estimated $316,000 for the 2012-13 year. This was revised to approximately $84,000 in deficit spending in the second interim report and approximately $893,000 in deficit spending in the third interim report. One month after completion of the third interim report, the district approved its 2012-13 budget that includes an estimated $2.2 million in deficit spending. The multiyear projections included with the 2012-13 adopted budget also indicate a negative general fund balance in fiscal year 2014-15.

4. Site and department administrators making unilateral personnel decisions can have significant impact on both position control and the district's budget. The district has directed that hiring decisions are not to be made until approved by the state administrator and presented to the board monthly in the personnel report. These practices along with written communications, including the position requisition and personnel action form, and the hiring of new site administrators, have eliminated hiring outside of the normal

personnel procedures. Prior to these changes, exceptions to the normal hiring process reportedly occurred for positions in the athletic program.

5. In addition to requiring the position requisition and personnel action form in individual employee payroll files to provide an audit trail, staff members have continued several procedures to reduce the risk of fictitious individuals or individuals who do not work for the district being added to the payroll, including the following:

   • An employee's demographic information must be entered into the position control module before payroll can be processed.

   • School site master schedules are compared to payroll lists.

   • A reconciliation of payroll is performed, tying the current month's payroll to the prior month.

   • Position control is compared to actual payroll at each interim reporting period.

   These procedures have enabled staff to readily detect payroll errors and have provided for funds to be returned to the district. However, during the short tenure of the permanent CBO, reconciling payroll to the prior month was not performed and resulted in 12 employees receiving overpayments totaling $24,933. The error was detected, payroll corrected and almost all of the overpayment returned to the district. The district continues to work with two employees for the return of approximately $600 in overpayments.

Recommendations for Recovery

The district should:

1. Continue to work toward implementing a position control module that interacts directly with the district's financial accounting software.

2. Ensure that the position control module includes all contracted positions as well as routine annual expenses such as substitutes, extra duty pay, stipends, vacation payouts and estimated column changes.

3. Update position control as changes are made to ensure that all revisions are captured in a timely manner.

4. Continue the directive that requires the state administrator's approval before hiring, and hold every employee accountable for following the directive.

5. Continue to require personnel requisitions and personnel action forms for all hiring and position changes.

6. Continue using internal control procedures to detect fictitious employees or nonemployees and protect against over- or under-payment of payroll.

Standard Partially Implemented
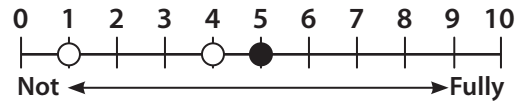
February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

Implementation Scale:

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8.1   Accounting

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

3. Board agendas and minutes

4. District cash flow statements

5. Adoption budget report, 2012-13

6. First, second and third interim reports, 2011-12

7. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

Board members were provided with a cash flow statement containing the actual year-to-date balances each month. However, monthly cash flow statements that include the actual year-to-date and projected information were needed. The district was not reconciling its cash balances in FMS to the cash in county treasury monthly. The district was reconciling its revolving cash fund; however, the reconciliation was not consistently signed and dated by the employee responsible for this duty.

Summary of Fourth Comprehensive Review, March 2013

Board members are provided with a cash flow statement containing the actual year-to-date and projected balances each month. A fiscal recovery plan needs to be implemented to minimize future cash flow deficiencies and draws from the state loan. The district is not reconciling its cash balances in FMS to the cash in the county treasury or the revolving cash fund monthly.

Findings

1. District staff and board agendas indicate that the board is provided with a cash flow statement each month, either as a separate report or with the budget adoption and interim reports. The statements provided through October 2012 include the actual year-to-date and projected ending cash balances for each month. Because of the district's fiscal status, it is critical that the board and the public understand the district's financial situation and

whether or not there is cash available to meet the district's obligations. Monthly cash flow statements that include the actual year-to-date and projected months' information for the current and subsequent fiscal year help facilitate this understanding.

2. In June 2009, the state legislature approved a $13 million emergency loan for the district. The district drew $5 million from the loan in fiscal year 2009-10; $4 million in 2010-11; and $1.5 million in 2011-12. All remaining loan proceeds, including unused funds from the previous draws, have been deposited and are accounted for in fund 17, Special Reserve Fund for Other than Capital Outlay Projects.

   The district's most recent general fund cash flow projection, dated September 5, 2012, indicates that the district will draw another $1.5 million from the state loan (now deposited in fund 17) in fiscal year 2012-13. This projection includes the following conditions for 2012-13:

   • July 1, 2012 beginning cash balance of $394,427.

   • June 30, 2013 ending cash balance of negative $509,404; as noted above, this balance includes a draw of $1.5 million from the state loan.

   Staff indicated that the district has not been automatically exempted from the state's cash deferrals to school districts in 2012-13 and must request an exemption each year. Staff also indicated that some of the remaining emergency loan funds may be needed for payments because of audit findings.

3. In the summer of 2011, the county office of education offered training for districts countywide regarding cash balancing procedures and responsibilities. The county office reconciles the countywide district fund in the county treasury to the records of the auditor-controller. Each district is then responsible for reconciling its cash activity to the cash balances indicated in FMS. At the time of FCMAT's fieldwork, the district's staff had not attended training provided by the county office, and the district was not reconciling cash balances in FMS.

4. Education Code Section 42800 provides for the establishment of a revolving cash fund (RCF). Such a fund is used to issue payment for services or supplies that are urgent and cannot wait for the normal accounts payable process, or to alleviate payroll errors. The district has established an RCF in the amount of $6,000 that is operated through a separate bank checking account. The district also uses the RCF as a clearing account in which funds from collection of items such as retiree benefits and developer fees are deposited and then cleared by writing a check to the county treasury. The CBO is responsible for reconciling this account each month. However, interviews indicated that because of the turnover in the CBO position, the account has not been reconciled since April 2012.

Recommendations for Recovery

The district should:

1. Continue to monitor its cash and prepare monthly cash flow statements that include actuals and projections for the current fiscal year, and projections for the subsequent fiscal year.

2. Implement a fiscal recovery plan to minimize future cash flow deficiencies and draws from the state loan.

3. Continue to request exemptions from the state's cash deferrals for 2012-13 and subsequent fiscal years.

4. Reconcile its cash balances in its financial management system (FMS) to the cash in the county treasury monthly.

5. Reconcile the revolving cash fund monthly, and ensure that the reconciliations are signed and dated by the employee responsible for this duty.

6. Consider opening a separate clearing account for cash and checks that are received by the district and subsequently deposited in the county treasury.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

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8.2   Accounting

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with district and school site staff

3. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

4. Monthly (end-of-month) payroll reconciliation forms, May and June 2012

Summary of Third Comprehensive Review, March 2012

The chief business official was the only district employee who had the training and experience needed to process payroll. The CBO was responsible for processing payroll and signing the preliminary payroll list, and had access to the pay warrants once they were received from the county office. This did not provide for proper internal controls, and the district needed to immediately train and assign another employee to process payroll.

Summary of Fourth Comprehensive Review, March 2013

The interim CBO continues to be the only district employee who has the training and experience needed to process payroll. The CBO is also responsible for signing the preliminary payroll list, and has access to the pay warrants once they are received from the county office. This does not provide for proper internal controls, and the district should immediately train and assign another employee to process payroll.

Findings

1. The district processes two payrolls each month: an end-of-month payroll for salaried positions and a supplemental payroll for hourly employees, stipends and other forms of compensation. The county office also allows manual payroll runs each month so that districts can correct any payroll errors or process items that were not submitted on time.

2. The CBO is responsible for processing each payroll and for preparing and signing the preliminary payroll list that is submitted to the Monterey County Office of Education. The county office then produces the payroll lists and warrants and sends them to the district office for distribution. The fiscal services manager separates the payroll lists and warrants by site. The fiscal services manager also prepares payroll vendor warrants for mailing to vendors. All of these warrants are secure and are provided to the receptionist,

who holds them for pickup by site staff. Staff indicated that employees are required to sign the employee payroll list to obtain their payroll warrant.

The interim CBO continues to be the only district employee who has the training and experience needed to process payroll. Proper internal controls would ensure that the employee responsible for processing payroll is not also the employee responsible for reviewing and signing the preliminary payroll list and does not have access to the pay warrants received from the county office.

3. The district continues to use the monthly (end-of-month) payroll reconciliation form to balance the month-end payroll and help ensure that mistakes are recognized before payroll is finalized. In addition, the human resources department continues to provide the business office with a personnel action form or a letter for all payroll changes. However, because of the turnover in the CBO position, reconciling payroll to the prior month was not performed routinely in summer 2012; staff indicated that there were several payroll errors during that time. As discussed in Standard 7.3, some of the payroll errors involved overpayments to staff, most of which had been repaid at the time of FCMAT's fieldwork.

4. County office staff continue to report that the district has submitted payroll reports on time, that it responds quickly to any inquiries regarding payroll and retirement reporting, and that CalSTRS and CalPERS reporting errors continue to decrease. However, the county office expressed concern that the district does not have adequate staffing for payroll and retirement functions.

Recommendations for Recovery

The district should:

1. Immediately train a district employee other than the CBO to process payroll.

2. Provide the employee assigned to process payroll with supervision and training to ensure that they have the most current information on all matters relevant to the task.

3. Ensure that the employee responsible for processing payroll does not also review and sign the preliminary payroll list or have access to the pay warrants after they are processed by the county office.

4. Continue to use the monthly (end-of-month) payroll reconciliation form and the personnel action form.

5. Ensure that the monthly (end-of-month) payroll reconciliation forms are signed and dated by the preparer to provide for proper internal controls and more thorough tracking.

Standard Partially Implemented

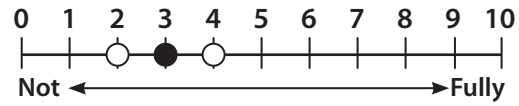February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

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9.2   Attendance Accounting

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with district and school site staff

3. Daily Apportionment Report for Month 2, 2012-13

4. Monthly Attendance Summary for Month 2, 2012-13, King City and Greenfield high schools

5. Gain and Loss Report, 5/21/12 through 6/1/12, Portola-Butler Continuation High School

6. 2012-13 Independent Study Attendance Report, September 2012

7. Report of School District Attendance, 2011-12 P-1, P-2 and Annual

8. Sample student record for Saturday School make-up

9. Board policies and administrative regulations

10. South Monterey County Joint Union High School District Manual on Student Enrollment, Attendance, Completers and Withdrawals

11. Aeries training schedule, 2012-13

12. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

The district continued to retain experienced and knowledgeable district office attendance reporting and truancy staff. However, as a result of reorganization of school site clerical staffing, some employees at the school sites were not experienced in student attendance functions and recognized the need for training. The district scheduled attendance and California Longitudinal Pupil Achievement Data System (CALPADS) trainings at both high schools in mid-September, but should have held it before the start of each school year. One of the district's two classes for severely handicapped students, which were previously operated by the county office, had not been claimed for attendance purposes on the 2010-11 P-2 Report of School District Attendance.

The district subsequently amended the report and was expected to generate approximately $70,000 of additional revenue.

Summary of Fourth Comprehensive Review, March 2013

The 2010-11 annual audit report included a finding that all of the attendance for the continuation school would be disallowed because one teacher used fictitious names on attendance reports. The district is requesting that the state disallow only the attendance for the one teacher involved; it estimates a loss of approximately $500,000 if the entire school's 2010-11 attendance is disallowed.

The district has implemented a credit recovery program to help students complete graduation requirements. However, not all stakeholders were included in the process. Although students are taking additional course work, the attendance system was not set up to accept grades for multiple courses in a single class period, and data must be corrected to show students' grades and course credits.

Findings

1. Average daily attendance generates the majority of the district's funding. Therefore, sufficient and ongoing training is crucial for employees who are responsible for attendance reporting. Board policies, administrative procedures and desk manuals are valuable resources for staff members whose duties include accurately reporting this critical information, which is essential to maximize funding. The district has approved several new board policies and administrative regulations regarding student attendance accounting and reporting.

2. The two comprehensive high schools record daily attendance in the Aeries student information system. Monthly attendance is reported to the student information manager in the district office. The district has created a desk reference manual on student attendance that contains complete instructions and district procedures to assist with data entry and reporting. Staff members directly responsible for inputting and reporting student attendance received this desk manual.

3. According to district procedures, school site attendance clerks are advised to generate the following reports to test the accuracy of data input at the site level and to identify unexcused absences and possible truant students:

   - Audit listing – identifies students with missing codes for absences.

   - ABI attendance submitted early – lists teachers who submit attendance early.

   - Missing ABI attendance – identifies missing attendance by teacher.

   - Period audit reports – prints a list of students who were not marked absent from a class on a specified date.

4. At the district level, the student information manager generates system reports daily, weekly and monthly to verify the accuracy of the student attendance reported at the school level. Query reports are used to cross-check entry dates with enrollment reports,

compare individual student attendance with the master course schedule, and cross-check student names from Aeries to CALPADS. Exceptions or unusual variances are examined further for possible reporting errors.

A previous recommendation for school sites to run daily reports has been implemented by both comprehensive high schools. These reports are used to verify the accuracy of the attendance and then make corrections as needed. In addition, the reports identify unexcused absences, which are referred to the truancy specialist after three days.

Mandatory weekly attendance reports are sent to the district office to verify the accuracy of data. These reports include the signature of the staff member responsible for taking attendance, certifying that the report is accurate.

5. Both comprehensive high schools have sufficient supporting documents to verify absences and procedures to notify parents regarding truant students. School site personnel work closely with the district's truancy specialist. Notification letters are sent to parents and/or guardians monthly, and following the second notification of truancy, habitual truants are referred to the county district attorney's office.

6. Mandatory attendance training for school site personnel was provided in October 2012. Mandatory annual training should give staff the opportunity to clarify procedures and ensure that any new laws and and/or regulations are communicated in a timely manner. To be most effective, mandatory training needs to take place before the start of each school year.

7. The 2010-11 annual audit report was prepared by the state controller's office and included a finding which indicated that all of the 2010-11 continuation school attendance would be disallowed because one teacher signed daily attendance reports using false names and fictional characters. The estimated funding loss due to this finding is $500,000; however, the district has filed an audit appeal. This may reduce the loss to the classroom of the teacher involved, but no estimate of this potential loss is available at this time.

    Teachers are required to take attendance in compliance with the California Code of Regulations (CCR), Title 5, Section 401, which states the following:

    > (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.

    The district needs to hold accountable any teacher who fails to complete an accurate record of attendance. All teachers should be reminded of the severe consequences of

falsifying attendance reports, and site administrators need to review signed attendance reports to verify the teachers' signature.

8. In an attempt to provide a credit recovery program to serve students who need credits to graduate and to increase ADA, the district has implemented two new programs. Odysseyware is a credit recovery and credit advancement classroom program that can pinpoint a student's proficiency level and establish a curriculum to be delivered at the individual student's pace. Bridgewater is Odysseyware's technology-driven curriculum that includes more than 60 grade-level courses in four core subject areas. This program can be used in the classroom or in a distance learning environment. Because many students live in remote areas of Monterey County, particularly south of King City, this type of program offers an alternative solution for students who have difficulty arranging transportation to school.

    King City High School includes a credit recovery class during first period, and Greenfield High School offers the class during second and third periods. One teacher is assigned to oversee all credit recovery classes at each school during these periods. Attendance is recorded the same as all other classrooms, but properly reporting grades is problematic.

    The current Aeries system configuration does not allow teachers to assign multiple grades to a student in one class period; therefore, pass or fail grades have been issued. Because the student information manager was not involved in implementing the Odysseyware program, individual courses for each credit recovery class have not been established in Aeries or coded properly in CALPADS, which contains the official student record for transcripts and graduation eligibility. The master schedule shows all classes under one section for each period.

    If students are to receive proper credit for each course, the system must be configured appropriately in Aeries, with proper class and teacher combinations in CALPADS. Records to date must be corrected for each individual student and amended reports sent to the county office and the state. Because of the extensive work required to correct these records and pending graduation for some students involved, time is of the essence and the district will need to expedite these corrections.

    The second program, Bridgewater, has been placed on hold for the current school year pending approval by the state.

9. The district office reconciles attendance reports for the required state reporting periods (P-1, P-2 and annual) with the monthly reports generated by the school sites. The state administrator reviews attendance reports prior to submission to the state. Having the business office review these reports before they are forwarded to the state administrator for review and approval would help ensure their accuracy.

10. The student information manager ensures timely submission of student data to CALPADS. Previous recommendations for the district to provide cross-training on the CALPADS system have not been implemented. The district needs to establish a cross-training schedule to ensure that essential functions can be maintained in the absence of

the student information manager. Self-paced CALPADS training is provided online by California School Information Services (CSIS). District staff should use this as a training resource.

11. The district has implemented online student attendance reporting for the independent study program; however, some teachers continue to turn in paper copies that are input into the system manually. The district needs to require all teachers to input the attendance in the Aeries online system.

Recommendations for Recovery

The district should:

1. Provide annual mandatory student attendance training before the start of the school year for attendance clerks, school secretaries and principals to ensure that proper procedures are followed consistently throughout the district.

2. Provide school site and district office staff with annual training regarding all new attendance accounting procedures.

3. Remind all teachers of their duty to complete accurate attendance records, and hold them accountable to Education Code and CCR requirements.

4. Ensure that site administrators review signed attendance reports to verify the signature of the teacher.

5. Correct student attendance records to date for each student in the credit recovery program, and amend reports sent to the county office and the state to ensure proper credit for graduation requirements. FCMAT strongly recommends expediting the corrections identified in this report.

6. Include all stakeholders when establishing new programs or contemplating changes that can have an impact on funding.

7. Ensure that the business office reviews state attendance reports before they are forwarded to the state administrator for review and approval.

8. Ensure that there is adequate cross-training for CALPADS reporting.

9. Require staff to use the online CALPADS training provided by CSIS.

10. Require all independent study attendance be entered into the Aeries student information system.

Standard Partially Implemented

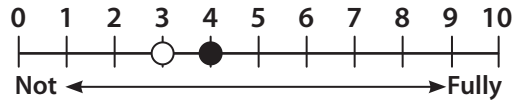February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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9.3　Attendance Accounting

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.

Sources and Documentation

1. Interviews with school site and district staff

2. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district had adopted or revised board policies and administrative regulations regarding independent study, home and hospital instruction, adult education, interdistrict attendance, and open enrollment. Requests for independent study were processed through the district's independent study charter school. The district continued to use Excel spreadsheets to record attendance data for its independent study students.

Summary of Fourth Comprehensive Review, March 2013

As of June 30, 2012, the district closed the independent study charter school and moved the independent study program under the control of the interim director of educational services. Previous recommendations to provide mandatory training in independent study have not been implemented. The district needs to use the Aeries student information system to record attendance for all programs, and conduct internal attendance audits throughout the fiscal year.

Findings

1. The district has adopted and revised several board policies and administrative regulations identified in this standard, except for charter schools and programs of choice. The district has continued to adopt board policies (BP) and administrative regulations (AR), including the following:

   • BP 5116, School Attendance Boundaries, adopted December 13, 2011

   • BP and AR 5116.1, Intradistrict Open Enrollment, adopted December 13, 2011

   • BP 6178.2, Regional Occupational Center/Program, adopted December 13, 2011

2. Independent study programs are offered to students upon request when absences will exceed five or more school days. Parents can request that their student be placed on independent study by completing an application and agreeing to the terms of the agreement. 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. Failure to follow the agreement will result in the state disallowing all independent study ADA credit for a student.

3. The district's independent study charter school closed on June 30, 2012. Issues contributing to the closure of the charter school included student-to-teacher ratios greater than 25-to-1 and failure to spend the required level of current year revenue in accordance with program guidelines. New requests for independent study are processed by the interim director of educational services.

4. Some teachers continue to record student attendance for independent study manually rather than using the Aeries system. This duplicates work and creates opportunities for error because clerical staff must input the attendance into the Aeries system manually. It would benefit the district to mandate that all attendance reporting be processed electronically using the Aeries system.

5. The district has not implemented previous recommendations to conduct internal audits to test the validity of the independent study attendance reported for apportionment purposes and to provide annual attendance training regarding independent study to school site staff.

Recommendations for Recovery

The district should:

1. Adopt board policies and administrative regulations regarding charter schools and programs of choice.

2. Use the Aeries student information system for independent study students to ensure complete and accurate attendance tracking and reconciliation.

3. Perform periodic internal audit procedures to test the validity of attendance reported for apportionment purposes.

4. Provide mandatory annual attendance training regarding independent study.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 2

Implementation Scale:

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      0  1  2  3  4  5  6  7  8  9  10
      |--○--●--|--|--|--|--|--|--|--|
      Not ◄─────────────────► Fully
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9.4 Attendance Accounting

Professional Standard

Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.

Sources and Documentation

1. Interviews with district and school site staff

2. Board policies and administrative regulations

3. Aeries training schedule, 2012-13

4. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

Annual training regarding attendance procedures were not scheduled. Because the majority of the district's funding was derived from student attendance, it was imperative to schedule mandatory training each year before the start of school and make additional training available when requested.

Summary of Fourth Comprehensive Review, March 2013

The district has provided annual training to all staff involved with attendance recording and reporting. Annual training needs to be mandatory, and additional training needs to be provided upon request any time during the year to ensure that staff are knowledgeable regarding current regulations and updates to the Aeries attendance system.

Findings

1. The district's 2010-11 annual audit report has findings related to attendance that include a potential loss of hundreds of thousands of dollars in funding as a result of improper attendance accounting procedures. It is critical for the district to have accurate attendance information to claim all revenue to which it is entitled. A major component of the district's fiscal solvency depends on ensuring that all staff responsible for attendance reporting and accounting are properly trained. Reporting inaccuracies, particularly in the continuation high school, have resulted in audit findings that include disallowing approximately $500,000 in apportionment for 2010-11. It is imperative that the district resolve these issues.

   The district has implemented mandatory attendance training sessions hosted by district office staff; however, the 2012-13 training was not conducted before the start of the school year. Additional training is offered upon request. The district provides support to enable all attendance and school site student service technicians to attend the Aeries conference each October.

2. It is important to verify attendance data at the school site and the district. Weekly attendance reports from school sites are used to verify district-level system reports. Schools have the ability to run daily audit reports, and these reports can identify exceptions or discrepancies that can be corrected during the current period. School sites are encouraged to run daily attendance reports to verify accuracy and spot check for tardies, habitual truants or unexcused absences. District and site staff indicated that each school site prepares daily reports.

3. As discussed in Standard 9.3, students in independent study need to be enrolled using the Aeries student information system for proper tracking and reporting.

4. The truancy specialist compiles information on student tardies and absences from Aeries reports as a basis for sending notices to parents or guardians. Parents or guardians can view their students' attendance record on the parent portal section of the district's website.

Recommendations for Recovery

The district should:

1. Continue to provide mandatory training and offer additional training opportunities for employees who are new to student attendance accounting.

2. Provide mandatory annual training before the start of each school year for all staff responsible for recording and reporting attendance to ensure that all staff members are familiar with current regulations and any new changes in the Aeries attendance system.

3. Ensure that all school sites enter student data into the Aries student information system and continue to run audit reports daily to highlight conflicts or concurrent enrollment exceptions.

4. Ensure that all attendance is recorded in the Aeries student information system to ensure proper tracking and reconciliation; this should include attendance for students in independent study.

5. Perform periodic internal control procedures to validate the accuracy of attendance reported for apportionment purposes.
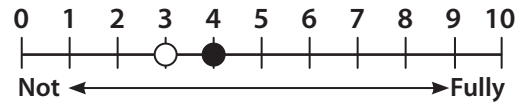
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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        0   1   2   3   4   5   6   7   8   9  10
        ├───┼───┼───○───●───┼───┼───┼───┼───┼───┤
          Not ◄─────────────────────────────► Fully
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9.6   Attendance Accounting

Professional Standard

The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.

Sources and Documentation

1. Interviews with district and school site staff

2. Monterey County District Attorney website

3. Truancy Specialist Report, 2011-12 for parent notification

4. Daily Apportionment Report for Month 2, 2012-13

5. Monthly Attendance Summary for Month 2, 2012-13, King City and Greenfield high schools

6. Report of School District Attendance, 2011-12 P-1, P-2 and Annual

7. Sample student record for Saturday school make-up

Summary of Third Comprehensive Review, March 2012

The Aeries truancy reports were monitored closely. System reports were generated several times each month, enabling the truancy specialist to intervene in time with habitual truants. The truancy specialist worked closely with parents to get students to school. During FCMAT's fieldwork, the truancy specialist represented the district in court with the Monterey County District Attorney's Office regarding several truancy matters.

Summary of Fourth Comprehensive Review, March 2013

The district does a superior job of monitoring truant students and working with the local district attorney's office to enforce compliance. There is a large difference in truancy rates between the two comprehensive high schools. The district needs to examine the underlying reasons for this variance and develop a plan to correct it. The Saturday school program provides an opportunity for students to make up attendance and for the district to receive additional apportionment. School administrators need to enforce Saturday school attendance and follow up to ensure that students have fulfilled their referral obligations.

Findings

1. The district places a high priority on student attendance and has developed a comprehensive plan to reduce the truancy rate. The truancy specialist is well known in the community and is instrumental in reaching out to parents and students. Together, the truancy specialist and the student information manager conduct mandatory staff training

regarding attendance and truancy issues before the start of each school year and provide ongoing training and assistance throughout the year.

2. The district actively seeks to reduce truancy and improve student attendance. School site staff generate and review student information system reports daily. If a student is absent for more than three days with no communication from the parent or guardian, school site staff contact the parent or guardian.

   Truancy letters and any communication with the parent or guardian are noted in the student record on the Aeries system for future reference. These notations include the date of communication, who staff spoke to, and the substance of the conversation. An unsuccessful attempt to reach the parent or guardian is followed up with a telephone call and in some instances a home visit by the truancy specialist.

3. The Monterey County District Attorney's Office aggressively enforces the education and vehicle codes in an effort to reduce the number of students who drop out of school and to divert behavioral problems from the juvenile justice system.

   According to the Monterey County District Attorney's website, the Monterey County Truancy Abatement Program enforces compliance with mandatory school attendance laws and regulations. The website states that the focus is "the reduction and eventual elimination of truancy in Monterey County." The school district and the district attorney's office share the goal of ensuring that students in Monterey County become responsible and productive individuals.

4. Education Code section 48260 (a) defines a student as truant if the student misses more than 30 minutes of instruction without a valid excuse three times during the school year. Effective January 1, 2011, Education Code section 48263.6 defines a chronic truant as a student who is absent from school without a valid excuse for 10% or more of the school days in one school year based on the enrollment date to the current date, provided that the appropriate district personnel complied with notification requirements to parents. A habitual truant, according to Education Code section 48262, is a student who has been reported as a truant three or more times in one school year, provided that an appropriate school employee has made a conscientious effort to hold at least one meeting with the parent or guardian.

5. The district sends the following three official notification letters to the parent or guardian of a habitually truant student in an effort to enforce compliance and have the documentation required for court mediation if needed:

   First Declaration of Truancy – Issued after three absences or three tardies of more than 30 minutes on three days without a valid excuse.

   Second Declaration of Truancy - Issued after three absences or three tardies of more than 30 minutes on three days without a valid excuse following the previous notice.

   Declaration of Habitual Truancy – Referral to the District Attorney - Issued after three absences or three tardies of more than 30 minutes on three days without a valid excuse following the two previous notifications.

The district tracks individual student truancies and monitors each student throughout the school year. The first letter of truancy is denoted as T1 in the Aeries system and is followed by a truancy conference. Students who continue to be truant following the truancy conference receive the second letter, referred to as T2, followed by a second conference. If a student is absent without a valid excuse or tardy for one or more days following the T1 and T2 letters, the third letter, referred to as T3, is issued, and the student and parent/guardian must attend a court-ordered mediation or hearing.

The table below shows the effectiveness of the truancy letters for both comprehensive high schools. Both schools experienced a significant drop of approximately 80% in notification letters from T1 to T3 in 2011-12.

Number of Truancy Letters Issued 2011-12 School Year		
Truancy Letter	King City	Greenfield
Letter: T1	113	238
Letter: T2	88	178
Letter: T3	24	54
Totals	225	470
Enrollment	889	864

 Although enrollment at the two high schools is similar, there is a substantial difference in truancy rates between the two schools. The district needs to identify the reasons for the difference and make corrections to reduce truancies at Greenfield High School.

6. The district's attendance rates for the first four weeks of the 2012-13 school year are shown in the following table. Administrators at King City High School are attempting to increase the enrollment-to-ADA percentage by allowing students who meet attendance requirements to be off campus during lunch. This creates an attendance incentive. Greenfield High School remains a closed campus at lunchtime.

School	Current Year Enrollment-to-ADA Percentage, Regular Education Program, September 2012
Greenfield High School	96.42%
King City High School	96.89%

7. Both comprehensive high schools offer Saturday school twice a month. This program offers students the opportunity to make up unexcused absences and allows the district to increase its apportionment. Staff indicated that attendance for Saturday school is not enforced at Greenfield High School.

Recommendation for Recovery

The district should:

1. Continue working with students, parents and the county district attorney's office to enforce attendance policies.

2. Identify the reasons for the large variance between the truancy rates at the two high schools, and develop a plan to reduce the high truancy rate at Greenfield High School.

3. Ensure that school administrators enforce attendance for students referred to Saturday school with follow up verification.

Standard Partially Implemented

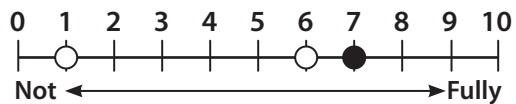February 2010 Initial Rating: 1

March 2011 Rating: 6

March 2012 Rating: 7

March 2013 Rating: 7

Implementation Scale:

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9.7   Attendance Accounting

Professional Standard

School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.

Sources and Documentation

1. Interviews with district and school site staff

2. South Monterey County Joint Union High School District Manual on Student Enrollment, Attendance, Completers and Withdrawals

3. Board policies and administrative regulations

4. Eagle Software website (www.aeries.com), training schedule and resource materials

Summary of Third Comprehensive Review, March 2012

During this review period, the district did not provide training sessions on attendance matters. Attendance staff members were required to attend training events in the previous reporting period and those interviewed expressed that the training was a valuable experience.

Summary of Fourth Comprehensive Review, March 2013

The district has adopted or revised several board policies and administrative regulations regarding student attendance that will provide guidance to district staff, parents and students. The district has implemented attendance training sessions but needs to include focused training using the online Eagle Software manual. The district has few district office personnel but nonetheless needs to provide cross-training in specialized tasks such as CALPADS reporting.

Findings

1. The district has implemented the previous recommendation to develop a desk manual for the Aeries student information system and has adopted or revised several board policies and administrative regulations regarding student attendance, including the following:

Board Policy or Administrative Regulation Number	Title	Board Approval Date
BP 5111	Admission	June 13, 2012
AR 5111.1	District Residency	April 17, 2012
AR 5111.12	Residency Based on Parent/Guardian Employment	February 8, 2012
BP/AR 5112.1	Exclusions from Attendance	August 8, 2012
BP/AR 5113	Absences and Excuses	June 27, 2012
BP/AR 5113.1	Chronic Absence and Truancy	November 16, 2011

BP 5116	School Attendance Boundaries	December 13, 2011
BP/AR 5116.1	Intradistrict Open Enrollment	December 13, 2011
BP/AR 5144.1	Suspension and Expulsion/Due Process	December 13, 2011
AR 5144.2	Suspension and Expulsion/Due Process (Students with Disabilities)	January 11, 2012
BP 5148.2	Before/After School Programs	January 11, 2012

2. The district has implemented mandatory training for all attendance personnel; however, the 2012-13 training was not conducted before the start of the school year. District staff also have access to online training programs for CALPADS provided by Eagle Software, the developer of the Aeries student information system. Online support for California secondary school users includes a free downloadable manual that has step-by-step instructions as well as several additional online resources. Employees responsible for CALPADS reporting need to receive training using the Eagle Software manual.

The information technology director is creating a monthly training schedule for all attendance staff members. This will give staff the opportunity to ask questions and exchange information on best practices.

Eagle Software offers regional attendance workshops and users' conferences throughout the year. The table below shows the courses offered and approximate schedule:

Workshop Title	Typically Offered
Attendance Accounting	December
Client Server Administration / Aeries & SQL	December & May
Client Server New Year Cycle	May
Customizing Aeries	December & May
Group Scheduling & Master Schedule Building	January through April
State Pre-ID and Loading Test Data	November
Student Scheduling	January through April

The district sent staff to Aeries training in October 2011 and would benefit from continuing attendance training to ensure that school site and district staff achieve the highest level of accuracy with the student information system. Organizations such as the California Association of School Business Officials (CASBO) offer student attendance workshops for district and school site staff. These workshops offer in-depth advanced training and updates on attendance reporting and new state regulations.

3. The district has not implemented the previous recommendation to cross-train all school office personnel in attendance procedures so they can provide coverage when another employee is absent.

4. The district has developed a comprehensive desk manual for student enrollment and attendance. This step-by-step manual provides in-depth instructions complete with the various Aeries codes to use and reports to generate. Reports include the following:

- Attendance period audit

- Audit listing

- Hourly/summer, weekly and monthly summary

- Monthly totals

- Absence audit and gain and loss

Recommendations for Recovery

The district should:

1. Conduct mandatory training sessions for all attendance personnel before the start of each school year.

2. Ensure that employees responsible for CALPADS reporting receive training using the Eagle Software manual.

3. Continue to ensure that district office and school site staff members responsible for student attendance accounting attend trainings provided by organizations such as CASBO and Aeries as needed.

4. Ensure that school office personnel are cross-trained in attendance procedures.

Standard Partially Implemented
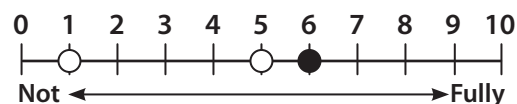
February 2010 Initial Rating: 1

March 2011 Rating: 5

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

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10.4 Accounting, Purchasing, and Warehousing

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.

Sources and Documentation

1. Interviews with the interim chief business official and the fiscal services manager

2. Board meeting minutes

3. Annual audit reports for the fiscal years ending June 30, 2009, June 30, 2010 and June 30, 2011

Summary of Third Comprehensive Review, March 2012

Because of minimal business office staffing, the district continued to struggle with providing proper supervision of activities, timely audited financial statements, and some of the controls needed to prevent and detect errors and irregularities. Audit adjustments increased for fiscal year 2009-10 compared to 2008-09 but remained fewer than the five adjustments reported in the 2007-08 audit report.

Summary of Fourth Comprehensive Review, March 2013

The district's struggle to provide proper supervision of activities continues and has been exacerbated by the turnover in the CBO position during this reporting period. The auditor's adjustments and findings have increased significantly, and the district continues to file its audited financial statements after the December 15 deadline and present them to the board after the January 31 deadline.

Findings

1. The business office was restructured again and now includes a chief business official (CBO), one fiscal services manager and one part-time business office technician. This reporting period has been tumultuous for the CBO position. It started and ended with the same person who had previously served as the interim CBO; however, the district hired a permanent CBO who started in May 2012 and resigned effective October 5, 2012. The district plans to work with School Services of California on another executive search for a permanent CBO and anticipates that the interim CBO will leave the district during fiscal year 2012-13.

   The business office restructuring was the third since 2009-10. With only 2.6 FTE positions to process all accounting transactions, it remains difficult for the district to provide the separation of duties needed to ensure an effective internal control

environment. However, like many small entities with limited personnel, the district has tried to arrange duties so that controls are in place to prevent and detect irregularities. These controls include the following:

- Dual signatures are required to process transactions.

- Journal and budget entries require backup and second-party review.

- Payroll procedures are designed to help prevent and detect employees who exist only on paper and over- or under-payments (see Standard 7.3).

- The state administrator reviews state attendance reports before they are submitted.

- Cash receipts are counted by more than one person.

- Receipt of goods or services is ensured prior to payment.

- The FMS software prohibits the posting of unbalanced journal entries.

- A hard stop feature in FMS prevents purchase orders from being issued if the budgeted balance is insufficient.

However, failure to follow all payroll procedures during the reporting period led to some payroll over- and under-payments, as discussed in Standard 7.3. State attendance reports also need to be reviewed by the business office before being forwarded to the state administrator for review, approval and submittal to the state.

2. Having 2.6 FTE positions in the business office has enabled the district to meet the majority of its periodic financial statement deadlines. However, during the CBO transition, the district did not comply with the requirement to revise its budget within 45 days after the governor signed the state budget act. In addition, cross-training has not occurred in numerous areas, including budget development, payroll and accounts payable.

3. Staff reported that FMS has allowed duplicate payments of the same invoice because it fails to recognize duplicate invoice numbers. This internal control concern has been reported to the Monterey County Office of Education, and the district remains vigilant in avoiding overpayments. However, without diligent oversight, duplicate payments can be made either purposely or unintentionally. This creates a significant internal control weakness, which is further increased because a limited number of business office staff process transactions.

4. Staff reported that journal entries due to account coding errors are no longer an issue. The main cause of journal entries during this reporting period was salaries and benefits being inappropriately charged to Title I, which was discovered during the Federal Program Monitoring review.

5. The audited financial statements for the fiscal year ending June 30, 2011 included five adjustments: two to the general fund, related to a debt service payment and interest earned on cash with the fiscal agent; and three to the special reserve fund for other than capital outlay projects (fund 17) related to correcting journal entries, recording cash with the fiscal agent and recording the cost of issuance related to cash with the fiscal agent.

This is an increase from the two adjustments in audited financial statements for fiscal year 2009-10 and is the same number of adjustments as in the 2007-08 audit report.

6. 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.

A review of the district's audited financial statements indicates that the last days of the auditor's fieldwork for fiscal years 2008-09, 2009-10 and 2010-11 were December 28, 2009, December 13, 2010, and February 23, 2012, respectively. The completion of fieldwork for the 2010-11 audit was the second tardiest in the past four years. The last day of fieldwork is when the auditor completes their testing and review of the client's books; it does not indicate the date that the financial statements were issued, which is typically one to two months later.

Education Code Section 41020.3 states, "By January 31 of each year, the governing body of each local education agency shall review, at a public meeting, the annual audit of the local education agency for the prior year…" The district has failed to comply with this code section by consistently presenting the annual audit report to the board after the January 31 deadline. Governing board meeting minutes indicate that the 2008-09 audit report was presented to the board on February 10, 2010, the 2009-10 audit report was presented on February 9, 2011 and the 2010-11 audit report was presented on March 21, 2012.

Further inquiry regarding this issue revealed that the delays were likely caused by the district's change in auditors, beginning with the 2010-11 report. The state controller's office is also responsible for the 2011-12 audit and had visited the district for three weeks from the end of September to mid-October to begin its work.

7. External independent audit findings continue to identify items as internal control weaknesses 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. Audit findings rose from eight in the audit for fiscal year 2009-10 to 28 in the audit for fiscal year 2010-11. The 2010-11 audit findings included such items as the district's capital assets and ASB accounts not being auditable, base rental payments not recorded properly, deficiencies in accounts receivable and ASB transactions, and deficiencies in payroll records and attendance reporting. Although these audits took place before much of the work the district is doing to strengthen internal controls, an increase in audit findings is of great concern because it indicates that the district's prior efforts have not yielded results.

8. The FMS is still unable to readily encumber payroll. Under FMS's present configuration, encumbering payroll would require completing and entering a purchase order for each employee, with the appropriate account coding for salary and each of the

various statutory benefits. At the end of each payroll cycle, the amount processed would then need to be manually disencumbered. Because the probability of error from such a manual system outweighs its benefits, the district is not able to implement this internal control and budget monitoring mechanism.

As noted above, the district will be implementing the Escape financial software system in July of 2013. Escape will reportedly have the ability to encumber payroll. However, the district will need to review its processes and procedures relative to the Escape system to ensure that it has incorporated an adequate level of control to prevent and detect errors and irregularities. This change continues to make the hiring of permanent business office staff an important priority.

Recommendations for Recovery

The district should:

1. Fill the CBO position with a permanent employee.

2. Consider making the part-time business office technician position full-time. This would provide three full-time positions in the business services office as shown on the district's organizational chart from the previous reporting period.

3. After filling the positions in the business office, review and revise procedures to increase separation of duties and oversight.

4. Ensure that the business office reviews the student attendance reports before they are forwarded to the state administrator and the state.

5. Ensure that staff are cross-trained in key functions including budget development, payroll and accounts payable.

6. Continue to monitor internal control procedures to ensure that duplicate invoice payments cannot be made.

7. Monitor the auditors' completion of the fiscal year 2011-12 annual audit to encourage compliance with EC 41020 and 41020.3.

8. Review and revise policies, procedures and internal control measures to address audit findings.

Standard Partially Implemented
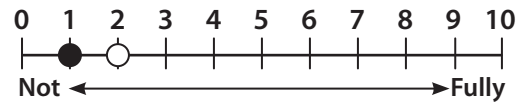
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 1

Implementation Scale:

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10.5   Accounting, Purchasing, and Warehousing

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.

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with district, school site and department staff

3. Master inventory report, May 7, 2012

4. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

Although the district had completed an inventory of its equipment in compliance with EC 35168 and 34 CFR 80.32 and 5 CCR 3946, there was a large internal control lapse that allowed items to be delivered to sites without being included on the fixed asset inventory. The district was able to cancel its previous outside services contract for inventory tasks that were not completed; however, it was unable to obtain a refund of fees paid. The district continued to struggle with providing in-service training to site and department staff regarding the online requisition system, items being delivered to nondistrict addresses, and internal control issues.

Summary of Fourth Comprehensive Review, March 2013

The district continues to encounter difficulties with its equipment inventories sufficient to prevent auditors from auditing its capital assets and to cause a qualified audit opinion. The district has engaged an outside vendor to remedy this problem. Although the district believes that no goods are being delivered to employees' residences, the fiscal year 2010-11 audit included a finding indicating that this practice continues. In addition, the district did not provide 19 of the 20 accounts payable packets FCMAT requested for testing; the one provided contained two anomalies.

Findings

1. Education Code Section 35168 requires the governing board to establish and maintain an inventory of all equipment items with a current market value of more than $500. When state or federal funds have been 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 (34 CFR 80.32 and 5 CCR 3946). In addition, at least once every two years, a physical inventory of equipment must be conducted and the results reconciled with the property records (34 CFR 80.32).

Governmental Accounting Standards Board (GASB) Statement No. 34 requires that capital assets be reported at historical cost. Capital assets 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.

The district's audited financial statements for fiscal year 2010-11 included audit findings 11-02, which indicated that the district's capital assets were not auditable, and 11-18, which indicated that the district has inadequate controls over capital assets and equipment purchased with federal funding. Finding 11-02 states that this condition caused a qualified auditor's report to be issued.

2. For technology and other equipment items delivered to the warehouse, staff members complete fixed asset accounting during the purchasing process. For items that are delivered to sites, the district has made efforts to establish fixed asset accounting procedures for use during the school year, including attaching a unique numbered asset tag to the equipment and recording pertinent information in the district's fixed asset inventory system. To bolster these internal inventory procedures, the district entered into an agreement with an outside vendor to provide inventory services for fiscal year 2011-12, including providing the district with an inventory master file and audit, barcode, and reconciliation of all fixed assets to place the district in compliance with GASB 34 requirements. The district's contract with the vendor for fiscal year 2012-13 limits its services to an audit of districtwide fixed assets. A copy of the master inventory report generated on May 7, 2012 lists furniture, business machines, computers, printers, audio visual equipment and other items totaling $4,152,331.

3. Staff reported that purchase order processing time has remained steady at one to two days. The district began using an online purchase requisition system two years ago, and most staff reported being comfortable with the system. Staff reported that the district is providing periodic trainings to reinforce knowledge of and proficiency in using the requisition system as well as answering questions as they arise. However, staff would benefit from an annual in-service before the start of school, including training in both the online requisition system and account coding. This information would reduce the number of questions site staff are now asking the CBO and the fiscal services manager via telephone and email, thus saving staff time.

4. Goods continue to be shipped to the district's warehouse if their destination is King City High School or district departments, or if they are large items. Goods are received and then delivered to the originator with the packing slip attached so that the originator can determine if they received what is listed on the packing slip. Purchases initiated at Greenfield High School are typically delivered to and received at that campus. After the originator has verified that the package contents and the packing slip match, they are supposed to sign the packing slip and return it to the district office. Receipt of packing slips at the district office continues to improve, and staff reported that they are no longer aware of employees or students receiving items at their homes instead of at district sites.

However, the 2010-11 audit reported findings of home delivery of purchases in both ASB and district expenditure testing.

5. Staff reported that purchase orders are required for all purchases; however, expenditure testing in the 2010-11 audit contained findings in this area. The purchase order process was altered to accommodate the FMS online requisition capabilities and has not changed since the third comprehensive review. The current process is as follows:

   • The originating site or department completes an online purchase requisition, a supervisor authorizes it, and it is forwarded to the business office for processing. The system encumbers at the requisition level, requiring that the budget be sufficient to enter the requisition. If a budget transfer is necessary, the site or department contacts the fiscal services manager to authorize, prepare and process the transfer. Once budget issues are resolved, the requisition is forwarded to the business office.

   • The fiscal services manager reviews the account coding.

   • The fiscal services manager prints the purchase orders and submits them to the CBO or state administrator for signature. Either the assistant superintendent of educational services and human resources or the director of special education also approves any purchase requisition charged to a categorically funded program.

   • The approved purchase order is then mailed or faxed to the vendor and delivered to the originator.

   • When an approved invoice is received, either the CBO or the fiscal services manager processes it for payment and prepares the accounts payable batch. Accounts payable warrant batches are prepared biweekly, though this may be extended to one time per month because of cash concerns. The warrant list is reviewed and approved by the business office employee who did not prepare the batch. Once approved, the batch is sent to the Monterey County Office of Education for processing. Warrants are then returned to either the CBO or the fiscal services manager for distribution to the payees.

   The current system can allow the same person who prepared the batch to have custody of the warrants once they have been issued by the county office. The limited number of business office staff creates a less than optimal internal control environment; however, duties should be separated to ensure that warrants are not returned to the employee who processed them for payment.

6. FCMAT requested samples of the district's accounts payable purchases for testing. Of the 20 items requested, the district provided one and the following anomalies were noted:

   • Invoice from CALSTRS was not paid on time, resulting in $1,313.24 in additional interest accruing.

   • Approval was missing on CALSTRS invoice payment (10/18/11).

Recommendations for Recovery

The district should:

1. Continue to refine and implement procedures to provide for fixed asset accounting for items delivered to sites.

2. Provide all 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.

3. Provide school site and department staff with training that will enable them to prepare and submit budget transfer requests.

4. Provide a detailed in-service to any person found to have received district property or who allowed district property to be received at any location other than a district site.

5. Improve internal controls by revising purchasing and accounts payable procedures to further separate the tasks assigned to the fiscal services manager and the CBO.

6. Revise accounts payable procedures to require payment by the due date to avoid additional interest charges.

7. Revise accounts payable procedures to require an approval signature on each invoice or receiver document to be paid.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

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   0  1  2  3  4  5  6  7  8  9  10
   ├──●──┼──┼──┼──┼──┼──┼──┼──┼──┤
     Not ◄─────────────────► Fully
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11.1   Student Body Funds

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)

Sources and Documentation

1. Interviews with district and school site staff

2. Agenda for the associated student body workshop, August 30, 2012

3. Board policies

Summary of Third Comprehensive Review, March 2012

The district adopted Board Policy 3452, Student Activity Funds, which provides a description and overview of fund raising and the management of student funds. The district needed to develop administrative regulations and detailed written procedures that provide guidance to school site personnel; without this, both high schools lacked a structure that ensured that education code, government code and taxation codes were followed.

Summary of Fourth Comprehensive Review, March 2013

The district has not implemented previous recommendations to adopt detailed administrative regulations that support Board Policy 3452 and that clearly define roles and responsibilities of personnel who manage student body activities and accounting. The district lacks internal controls and standard accounting methods in this area, which leaves it vulnerable to misappropriation of assets and other fraudulent activity.

Findings

1. During the prior review period, Board Policy 3452, Student Activity Funds, was adopted and provides a generic description of student body funds in the following areas:

   - Student Body Funds – An overview of the purpose.
   - Fund-Raising Events – The process for event approval by the governing board.
   - Management of Funds – Information indicating that staff shall develop internal controls processes and procedures to provide reliable financial information and reduce the risk of fraud and abuse.

   Board Policy 3452 also states the following:

   These procedures shall detail the oversight of activities and funds

including, but not limited to, the appropriate role and provision of training for staff and students, parameters for events on campus, appropriate and prohibited uses of funds, and accounting and record-keeping processes, including procedures for handling questionable expenditures.

However, the district has not implemented previous recommendations to adopt administrative regulations and internal written procedures that provide direction to staff; ensure effective administrative oversight; and clearly define the roles and responsibilities of personnel involved in managing student body activities and funds. It would benefit the district to have administrative regulations and a procedures manual that include the following topics:

- The roles and oversight responsibilities of the board, superintendent, business office, school principal, ASB advisor and ASB leadership council

- Applicable laws and regulations that govern operations, fund-raising activities, food sales, and filing of sales and use taxes

- Formation of clubs and requirements for keeping minutes that include details of each meeting's proceedings including financial matters, authorization for expenditures, and fund-raising approvals

- Accounting and financial management that includes practices for internal controls, maintaining ASB records, contracts, bank reconciliations, financial reports, and other bookkeeping functions

- Cash management and cash handling procedures for collections and disbursements

- Budgets and budget management

- Allowable fund-raising events

- Gifts and donations

The district also needs to develop procedures for the district office regarding the oversight, management and internal audits that need to occur to protect the district in this area. Management will need to clearly segregate the responsibilities of district staff and school site ASB personnel to ensure that proper internal controls are maintained and that the district maintains adequate oversight of student body funds.

2. As discussed later in Standard 11.3, the district has implemented the recommendation to provide training and make the FCMAT ASB manual available to all personnel involved with ASB activities, oversight and accounting. Although the manual is an excellent resource that provides sample forms and documents and legal citations, and defines the various roles and duties of employees responsible for ASB activities and functions, it is not a substitute for board policy and supporting administrative regulations.

Recommendations for Recovery

The district should:

1. Adopt and implement detailed administrative regulations to support Board Policy 3452, as well as internal written procedures. At a minimum, the topics listed above should be included in the administrative regulations and procedures manual.

2. Develop procedures for the district office regarding the oversight, management and internal audits that need to occur to protect the district in this area.

3. Clearly segregate the responsibilities of district staff and school site ASB personnel to ensure that proper internal controls are maintained and that the district maintains adequate oversight of student body funds.

Standard Partially Implemented

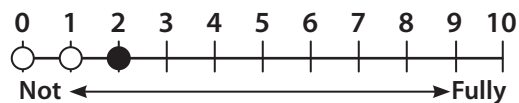February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        ○──○──●──┼──┼──┼──┼──┼──┼──┼──┤
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11.3   Student Body Funds

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.

Sources and Documentation

1. Interviews with district and school site staff

2. Agenda for the associated student body workshop, August 30, 2012

Summary of Third Comprehensive Review, March 2012

The district adopted one board policy that provides an overview of student body organizations but had not approved administrative regulations, desk manuals or written guidelines. Fund deposits, bank reconciliations and cash disbursements had been centralized at the district office. School sites needed to be performing these tasks, and needed a plan to ensure internal control procedures on campuses. The district had tried to implement some internal controls, but inconsistent and varying procedures had left both schools out of compliance with regulations, internal control procedures and generally accepted accounting principles.

Summary of Fourth Comprehensive Review, March 2013

The district provided ASB training and a FCMAT ASB Manual to staff. The district has not identified all staff members responsible for ASB tasks or their individual responsibilities. This needs to occur, and special attention needs to be given to the proper segregation of duties to ensure adequate oversight and reduce the risk of misappropriation of assets and other fraudulent activities. Standard procedures need to developed, and school administrators need to be held accountable for oversight.

Findings

1. The district has implemented prior recommendations to provide ASB training. Three training events were provided by FCMAT during July and August 2012. Each presentation focused on specific attendees as follows:

    • Principals – General overview of ASB with an emphasis on site administrators; over-sight responsibility.

    • Certificated advisors – Specific responsibility for club activities including fund-raising events and procedures for cash handling and purchasing.

    • All ASB staff –Focused on bookkeeping functions, pre-approvals, various forms, record retention, and bank reconciliation.

Training topics included the following:

- Annual club information form

- Application to create a student club

- ASB contact information and procedures

- ASB meeting minutes

- ASB request for pre-approval of reimbursement

- Budget development

- Cash count and change request forms

- Instructions for structuring meetings

- Purchase requisition form

- Receipt ticket log

- Request for fund-raiser approval

- Request to carry over excess fund balance to new fiscal year

- Drafting of the ASB constitution

- Tickets and cash handling

All attendees received a FCMAT ASB Manual for reference. The manual includes the roles and responsibilities for administering an ASB; sample forms with detailed instructions; and codes, regulations and laws that govern ASB activities. Ongoing ASB training is needed periodically for current staff members, as is mandatory training for new staff members who have any responsibility for ASB tasks.

2. The district has split the MOTF technician position into a part-time business office technician and part-time MOTF technician position. The technician spends 60% of her time at the district office and 40% at the MOTF office, and is assigned many of the detailed ASB accounting functions that were previously assigned to the district's CBO.

   The district originally split each work day between the two assignments so that the technician would be available every day at the district office to collect money and perform other ASB activities, then report to the maintenance and operations department for the balance of the day. This was changed within a few months and now the technician spends three days per week at the district office and two at the MOTF office. Until ASB functions are returned to the school sites, it would benefit the district to revert to splitting each day between the district and MOTF offices to ensure that the technician is available to collect cash, make bank deposits and perform other ASB functions daily.

   Because centralized ASB accounting does not build capacity for the eventual return of these functions to the school campuses, the district needs to develop a plan to return ASB functions to the school sites with an ASB clerk at each site.

3. Cash deposits that have been counted twice at the school site are counted a third time at the district office before they are deposited in the bank. It would be more efficient

for each deposit to be double counted at the site for verification and internal control purposes, placed in a sealed deposit bag, and then deposited directly in the local bank by a school site employee. Subsequent bank deposit verification can then be sent directly to the district office and compared with the bank statements during the month-end reconciliation process.

4. The district transitioned both comprehensive high schools to specialized ASB software as of July 1, 2012 and opened two separate bank accounts locally. This will provide a framework for consistency and the eventual transition of ASB accounting from the district to the school sites.

5. As previously discussed, the district has not developed or implemented administrative regulations that support BP 3452. At a minimum, the district needs to develop written procedures that identify which staff members are accountable for various aspects of ASB cash collection for student activities and fund-raisers, making custodial and security arrangements for athletic events, processing purchase requisitions with proper account codes, and bookkeeping and reconciliation functions. Many of these functions are assigned to various school site employees who have not been trained in ASB accounting. Without district policies and procedures, each school site has created its own set of processes, which are not consistent and could leave sites out of compliance with ASB regulations and pose serious concerns regarding internal control management.

6. Staff indicated that the district's 2010-11 audit findings had not yet been shared with applicable staff members because the district has filed an appeal with the state regarding many of the findings. It is best practice to review audit findings with staff as soon as the audit is received to help ensure that procedures are corrected and that staff are held accountable for following them.

Recommendations for Recovery

The district should:

1. Ensure that site administrators, club advisors, support staff and ASB bookkeepers have a current copy of the FCMAT ASB Manual, which is available free online, and provide training as needed for current staff and mandatory training for new staff members who are responsible for ASB tasks.

2. Consider splitting each of the business office/MOTF technician's work days between the district and MOTF office.

3. Consider hiring a part-time ASB clerk at each school site or a full-time clerk position that is split between the two sites, rather than centralizing ASB functions.

4. Assign school site staff to double count each deposit, place the funds in a sealed deposit bag and then deposit them directly in the local bank.

5. Develop and implement written guidelines and instructions that identify the staff members who are accountable for each duty related to ASB, and develop, distribute and oversee ASB accounting procedures, particularly cash handling.

6. Share annual audit findings with school site and department staff each year following completion of the audit. Implement processes and procedures to correct each finding, and hold staff accountable to ensure that procedures are followed.
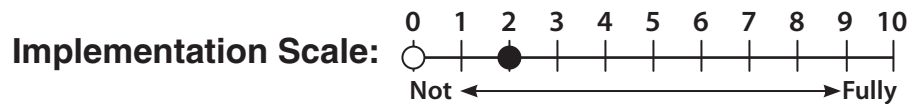
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 0

March 2013 Rating: 2

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

12.1   Multiyear Financial Projections

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)

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

3. Adoption budget report, 2012-13

4. First, second and third interim reports, 2011-12

5. Monterey County Office of Education budget review letters regarding 2011-12 first, second and third interim reports and 2012-13 adopted budget report

Summary of Third Comprehensive Review, March 2012

A review of the first, second and third interim reports for fiscal year 2010-11 and the 2011-12 adoption budget indicated that the district continued to provide multiyear financial projections (MYFPs) for the general fund at each reporting period. However, the MYFP prepared in August 2011 following approval of the state budget indicated a negative ending balance in the unrestricted general fund in fiscal year 2013-14. Significant work remained to address the district's structural deficit, particularly given state cuts to the education budget.

Summary of Fourth Comprehensive Review, March 2013

The first, second and third interim reports for fiscal year 2011-12 and the 2012-13 adoption budget indicate that the district continues to provide multiyear financial projections (MYFPs) for the general fund at each reporting period. However, the MYFP prepared with the 2012-13 adoption budget indicates a negative ending balance in the unrestricted general fund in fiscal year 2014-15. Therefore, significant work remains to address the district's structural deficit.

Findings

1. A review of the district's 2011-12 first, second and third interim reports and the 2012-13 adoption budget indicates that the district provides MYFPs for the general fund at each reporting period. Each report included a list of assumptions used in developing the MYFPs. However, the list of assumptions provided with the 2011-12 first interim report

did not include factors for step and/or column increases, although small increases were included on the MYFP, and the ADA listed in the narrative did not match the MYFP.

2. The assumptions provided with the 2011-12 second interim report included the following discrepancies:

   • The narrative did not include assumptions for lottery revenue, but the annual amounts on the SSC Dartboard, dated January 19, 2012, had increased to $117.25 per ADA for base funding and to $23.25 per ADA for Proposition 20 funding.

   • The narrative indicated a step and/or column increase of .05% for certificated and classified salaries, but the multiyear projections included a cost of .50%.

3. The assumptions provided with the 2011-12 third interim report included the following discrepancies:

   • The narrative did not include assumptions for lottery revenue, but the annual amounts on the SSC Dartboard, dated February 15, 2012, were $117.25 per ADA for base funding and $23.25 per ADA for Proposition 20 funding.

   • The narrative listed amounts for ADA that did not match the MYFP.

   • The narrative indicated a step and/or column increase of .05% for certificated and classified salaries, but the multiyear projections included a cost of .50%.

   • The narrative for 2012-13 included a loss of $282,113 in transportation funding; however, the SSC Dartboard indicated that the mid-year trigger cut was included in the 2011-12 revenue limit deficit factor.

   • The narrative for 2013-14 did not include the mid-year trigger cut included on the SSC Dartboard.

4. The assumptions provided with the 2012-13 adoption budget included the following discrepancies:

   • The narrative did not include assumptions for lottery revenue, but the annual amounts on the SSC Dartboard, dated 2012-13 May Revision, were $118 per ADA for base funding and $23.75 per ADA for Proposition 20 funding.

   • The narrative indicated a step and/or column increase of .05% for certificated and classified salaries, but the multiyear projections included a cost of .50%.

   • The narrative for fiscal years 2013-14 and 2014-15 did not include the projected percentage increase for the trigger cuts as indicated on the SSC Dartboard.

5. The district's most recent MYFP was completed with the 2012-13 adoption budget and included the following projected amounts for the district's unrestricted general fund:

	2012-13	2013-14	2014-15
Increase/(Decrease) in Fund Balance	(709,908)	(979,087)	(1,815,019)
Ending Fund Balance	1,428,670	449,582	(1,365,437)

Although the governor's tax initiative, Proposition 30, was approved by the voters in November 2012 and eliminated the projected ongoing mid-year trigger cuts of $441 per ADA, the district still has a significant amount of work to do to ensure that there is structural balance between anticipated revenue and expenditures, and to restore the 3% reserve for economic uncertainties in 2014-15.

The above projections include draws from the state loan of $1.5 million in 2012-13 and $1 million in 2013-14. The projection also includes an annual debt service payment of approximately $1.24 million for the state loan. The loan's 20-year repayment period began in 2010-11.

Recommendations for Recovery

The district should:

1. Continue taking steps to eliminate its structural budget deficit.

2. Ensure that its MYFPs include a detailed list of assumptions that incorporate the most current information available.

Standard Partially Implemented

February 2010 Initial Rating: 1
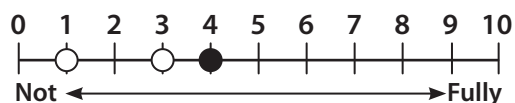
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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   Not ◄──────────────────────────► Fully
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12.2   Multiyear Financial Projections

Legal Standard

The 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)

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

3. Collective bargaining agreements with the certificated and classified employee associations

4. Board agendas and minutes

Summary of Third Comprehensive Review, March 2012

Monetary items in the collective bargaining agreement settlements were included in the MYFPs completed during the previous review period. Although the district had made significant progress toward balancing its budget, a structural deficit remained, and guidelines for collective bargaining were needed to ensure fiscal solvency.

Summary of Fourth Comprehensive Review, March 2013

Memoranda of understanding (MOUs) with employee bargaining units need to be included in the board packet, and MYFPs should be prepared for MOUs if they contain a significant financial impact. A structural deficit remains in the district's budget and multiyear projections, and guidelines for collective bargaining are needed to ensure fiscal solvency.

Findings

1. During a previous review period, the state administrator approved the collective bargaining agreement with the district's certificated employee bargaining unit for July 1, 2010 to June 30, 2013, and on January 13, 2011 the parties approved several MOUs and signed the agreement.

    The March 21, 2012 board meeting minutes indicate that an MOU was approved for a one-time retirement incentive. However, the MOU was not included in the board packet posted to the district's website, and staff indicated that an MYFP was not prepared.

2. During a previous review period, the state administrator approved the collective bargaining agreement with the district's classified employee bargaining unit for July 1, 2010 through June 30, 2013, which was signed on December 10, 2010.

   The March 21, 2012 board meeting minutes indicate that an MOU was approved for a one-time retirement incentive. However, the MOU was not included in the board packet posted to the district's website, and staff indicated that an MYFP was not prepared.

3. Although the district has made significant progress toward balancing its budget, a structural deficit remains, and a negative unrestricted general fund balance of ($1,365,437) is projected for 2014-15.

Recommendation for Recovery

The district should:

1. Include MOUs with employee bargaining units in the board packet.

2. Prepare MYFPs for MOUs with employee bargaining units if there is a significant financial impact.

3. Ensure that guidelines developed for collective bargaining align with the goal of fiscal solvency.

Standard Partially Implemented
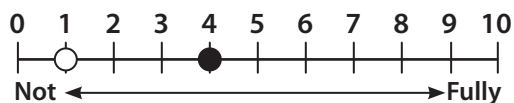
February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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      Not ◄                ► Fully
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14.1   Impact of Collective Bargaining

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))

Sources and Documentation

1. Interview with the interim chief business official

2. Interviews with school site staff

3. Interviews with the Monterey County Office of Education superintendent, associate superintendent for business services, and district advisory services staff

4. Board meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

The majority of the articles in each collective bargaining agreement were settled during the prior review period, and remaining articles were settled during this review period. In addition, the district negotiated some MOUs and tentative agreements with the employee bargaining units on other matters. Some of these items were not presented at a public board meeting prior to ratification.

Summary of Fourth Comprehensive Review, March 2013

The district negotiated some MOUs and reinstatement of the seven-period school day with the employee bargaining units. However, these items were not presented at a public board meeting prior to ratification, nor were public disclosure documents prepared for them.

Findings

1. Government Code section 3547.5 states the following:

   > (a) Before a public school employer enters into a written agreement with an exclusive representative covering matters within the scope of representation, the major provisions of the agreement, including, but not limited to, the costs that would be incurred by the public school employer under the agreement for the current and subsequent fiscal years, shall be disclosed at a public meeting of the public school employer in a format established for this purpose by the Superintendent of Public Instruction.

   > (b) The superintendent of the school district and chief business official shall certify in writing that the costs incurred by the school district under the agreement can be met by the district during the term of the agreement.

This certification shall be prepared in a format similar to that of the reports required pursuant to Sections 42130 and 42131 of the Education Code and shall itemize any budget revision necessary to meet the costs of the agreement in each year of its term.

2. Staff members interviewed indicated that negotiations with employee bargaining units during this review period were for MOU items only. The March 21, 2012 board meeting minutes include the following report from closed session actions:

> The MOU between the employees organizations were approved for the one time retirement incentive. There was discussion regarding negotiations, but no action was taken.

The MOU was not included in the board packet posted to the district's website, and staff indicated that a public disclosure was not prepared for this item.

3. The seven-period school day was reinstated at the comprehensive high schools for the 2012-13 school year. However, no evidence was found indicating that this item had been presented at a public board meeting or that a public disclosure had been prepared.

Recommendation for Recovery

The district should:

1. Ensure that the public disclosure requirements are met for all items related to its collective bargaining agreements.

Standard Partially Implemented

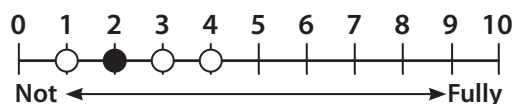February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 3

March 2013 Rating: 2

Implementation Scale:

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     0   1   2   3   4   5   6   7   8   9  10
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     Not ◄─────────────────►Fully
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14.2   Impact of Collective Bargaining

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)

Sources and Documentation

1. Interviews with the state administrator and the interim chief business official

2. Board meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

The initial proposals regarding the 2011-12 reopeners for the collective bargaining agreement with certificated employees were sunshined as required by Government Code section 3547. However, the board minutes did not indicate that the district had adopted its initial proposal.

Summary of Fourth Comprehensive Review, March 2013

The district's initial proposals regarding the 2013-14 collective bargaining agreements with certificated and classified employee groups were sunshined as required by Government Code Section 3547, and the meeting minutes indicate that the state administrator approved the district's proposals. The district negotiated some memoranda of understanding (MOUs) and the reinstatement of the seven-period school day with the employee bargaining units; however, these items were not presented at a public board meeting prior to ratification as required by Government Code Section 3547.5.

Findings

1. The April 17, 2012 board meeting agenda included an information item titled "Public Notice of Initial District Proposal to the KCJUHSDTA Contract" for the 2013-14 contract with the certificated employee bargaining unit. The agenda also included an action item titled "Approval of Negotiations Proposal 'Sunshine' for Successor Agreement of SMCJUHSD/KCJUHSDTA Contracts." The April 17, 2012 meeting minutes indicate that the state administrator approved the district's proposal.

    At the time of FCMAT's fieldwork, the certificated employee bargaining unit had not submitted its initial proposal to the district.

2. The April 17, 2012 board meeting agenda included an information item titled "Public Notice of Initial District Proposal to the CSEA Local Chapter 529 Contract" for the 2013-14 contract with the classified employee bargaining unit. The agenda also included an action item entitled "Approval of Negotiations Proposal 'Sunshine' for Successor Agreement of SMCJUHSD/CSEA Local 529 Contract." The April 17, 2012 meeting minutes indicate that the state administrator approved the district's proposal.

At the time of FCMAT's fieldwork, the classified employee bargaining unit had not submitted its initial proposal to the district.

3. As discussed in Standard 14.1, the district negotiated some MOUs and reinstatement of the seven-period school day with the employee bargaining units. However, these items were not presented at a public board meeting prior to ratification as required by Government Code Section 3547.5.

Recommendation for Recovery

The district should:

1. Continue to ensure that initial bargaining proposals are sunshined in accordance with Government Code Section 3547.

2. Ensure that the public disclosure requirements are met for all agreements subject to the collective bargaining process in accordance with Government Code Section 3547.5.

Standard Partially Implemented
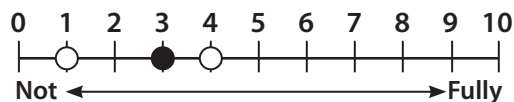
February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 3

Implementation Scale:

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14.3   Impact of Collective Bargaining

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 board. The 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. Board parameters are provided in a confidential environment, reflective of the obligations of a closed executive board session.

Sources and Documentation

1. Interviews with the state administrator and the interim chief business official

2. Interviews with district staff

3. Interviews with board members

4. Board meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

Information regarding collective bargaining was provided to the board members in closed session. However, additional district staff members needed to be included on the negotiating team.

Summary of Fourth Comprehensive Review, March 2013

Information regarding collective bargaining is provided to the board members in closed session. The newly appointed state administrator plans to include some management staff members on the district's negotiating teams for the 2013-14 collective bargaining agreements.

Findings

1. Board meeting agendas and interviews continue to indicate that the state administrator provides information regarding negotiations with the district's employee associations to the board members in closed session.

2. The district's initial proposals for the 2013-14 collective bargaining agreements with the certificated and classified employee groups list numerous articles and indicate the district's intent to modify the language in each of them. The proposals also state the following:

    The South Monterey County Joint Union High School District has a

commitment to fundamental values which include:

- Academic Achievement for all Students

- Closure of the Achievement Gap between all Statistically-Significant Student Groups

- Fiscal Responsibility

- Long-Term Stability of District Services for Staff and Students

- Professionalism and Accountability for All Employees

These values and the goals guide the District in proposing adjustments to current contract language, and guide the development of responses to all proposals in negotiations.

3. Interviews indicated that the newly appointed state administrator plans to include management staff members on the district's negotiating teams for the 2013-14 collective bargaining agreements, rather than being the only district representative in negotiations. Including additional district team members will help build organizational capacity and help ensure that information is interpreted and agreements are implemented properly.

Recommendations for Recovery

The district should:

1. Continue to consider and evaluate the effects that any tentative collective bargaining agreement may have on students' educational opportunities, the quality of support services and the district's fiscal solvency.

2. Continue with its plans to include district staff members, such as the CBO and human resources administrator, on the district's negotiating teams.

Standard Partially Implemented

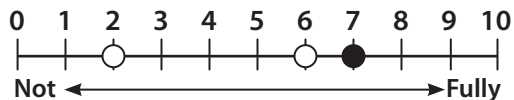February 2010 Initial Rating: 2

March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        |--|--O--|--|--|--O--●--|--|--|
        Not ◄─────────────────► Fully
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15.2   Management Information Systems

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.

Sources and Documentation

1. Interviews with district staff

2. Aeries support team meeting financial management system (FMS) training, October 3, 2012

3. District technology plan, July 1, 2010 – June 30, 2013

4. Equipment inventory, August 1, 2011 – December 3, 2012

5. Equipment replacement schedule

6. Technology policies and procedures manual

7. Microsoft licensing implementation plan

8. District website training sign-in sheet, September 19, 2012

9. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

Several new software programs had been implemented during this review period. Each program was supported by training provided by the technology department. The district had not made any changes to integrate the various operating systems that report information for finance, student attendance, teacher credentialing, or position control. The district continued to use several download routines to produce the information required for state reporting.

Summary of Fourth Comprehensive Review, March 2013

The district faces substantial potential funding losses resulting from deficiencies in attendance reporting. With proper oversight and training, these losses could have been avoided. The district established a new Aeries support team to give staff responsible for attendance accounting and reporting the opportunity to exchange information and ask questions. The district is converting its financial reporting and human resources software systems to Escape Technology, Inc.,

effective July 1, 2013, as are other districts throughout Monterey County. Several staff members expressed concerns about adequate training and readiness for this conversion.

Findings

1. As indicated in the 2010-11 annual audit report, the district has a potential loss of hundreds of thousands of dollars because of incorrectly recorded and/or reported attendance data to the state. Continual ongoing training is vital to ensure that the district collects all the state revenue it is entitled to receive. Although management has increased efforts to provide training to staff who are directly involved with attendance reporting, no training is provided to teachers or administrators. From the classroom to the district office, every employee who has any responsibility for taking, reporting and overseeing attendance needs training, with an emphasis on proper procedures, specifically in areas where apportionment has been disallowed.

2. During this review period, the district created an Aeries support team. This team includes the information technology director, the student information manager and the interim director of educational services, and is designed to provide information on upcoming Aeries training events and provide for the exchange of information between attendance staff members. The team held its first meeting on October 3, 2012. Three representatives from each comprehensive high school and one from the continuation high school attended. This is an important first step in ensuring that attendance personnel receive the latest information available and have the ability to exchange information as a user group.

3. No attendance training has been scheduled for teachers or administrators. The district needs to provide training that includes proper procedures for independent study and all the required elements for program compliance and funding, because substantial funding losses have occurred in this area. Teachers should also be made aware of the consequences for falsifying attendance records, and administrators should be reminded of their duty to oversee these important records.

4. The county office is converting districts in Monterey County to a new financial and human resources software system developed by Escape Technology, Inc. The Escape system will integrate all the financial components, including payroll, position control, budget, budget development, purchasing and general ledger. The district is scheduled to go online with the new system on July 1, 2013. In preparation, the information technology director and the human resources administrator have attended several training sessions, and have expressed concerns about the district's readiness to make the conversion by July 1, particularly with data export/import validation and staff training. At the time of FCMAT's fieldwork, staff members in the business office had received little or no training.

    The county office and district administrators need to ensure that all staff members at the district office level received proper training prior to converting to Escape and that adequate support is available following the conversion.

5. There continues to be a lack of integration among the district's human resources and student information systems and the state's student information system. This creates the potential for errors because information is entered manually into multiple operating systems. Once the district converts to the Escape system, the district will continue downloading data from the student information system and uploading data through the attendance system for CALPADS reporting. It will be necessary for the district staff to implement methods to validate this data.

6. The district's technology department staffing remains unchanged, with the director, one full-time technician II and one part-time technician. During this review period, the information technology team was reorganized from a decentralized to a centralized operation to support a wide spectrum of technology support services districtwide.

7. The district has a three-year technology plan that was developed with the input of many stakeholders and can be found on its website. The technology plan is for July 1, 2010 through June 30, 2013 and serves as a guide for hardware standardization, identification of district needs, and equipment replacement. The plan is required for the district to receive state grants and federal E-Rate funding and provides clear goals and objectives with annual benchmarks.

8. During this review period, the district implemented new software programs and upgraded the districtwide Microsoft license agreement. New software and upgrades include the following:

   • Odysseyware – This is an on-going distance learning program for credit recovery and accelerated credit enhancement. This program replaces NovaNET.

   • Microsoft Office 2010 – This new license agreement includes free training for staff to receive Microsoft certification with self-paced online program modules.

   • New web page for each school – The new web pages allow teachers to have an individual web page to which they can upload homework, post messages for students and update emergency contact information.

   • New email server – This will upgrade to GroupWise 2012 which is more compatible with mobile devices.

Recommendations for Recovery

The district should:

1. Ensure that all employees who use the district's student information system have received annual training with an emphasis on proper procedures, specifically in areas where apportionment has been disallowed.

2. Provide training on proper procedures for independent study, including training on all the elements required for program compliance and funding. Include teachers and administrators in applicable attendance training sessions.

3. Make teachers aware of the consequences for falsifying attendance records, and remind administrators of their duty to oversee these records.

4. Work with the county office to ensure that all staff members at the district office receive proper training prior to converting to Escape on July 1, 2013.

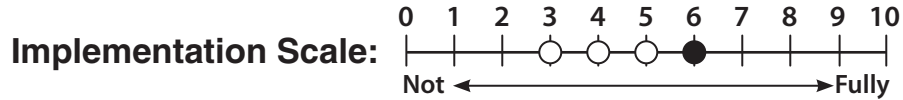5. Ensure that adequate support is available once the conversion has occurred.

Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

Implementation Scale:

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    0  1  2  3  4  5  6  7  8  9  10
    ├──┼──┼──○──○──○──●──┼──┼──┤
    Not ◄──────────────────► Fully
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15.3   Management Information Systems

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, 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.

Sources and Documentation

1.   Interviews with district staff

2.   Aeries support team meeting FMS training, October 3, 2012

3.   District technology plan, July 1, 2010 – June 30, 2013

4.   Equipment inventory, August 1, 2011 – December 3, 2012

5.   Equipment replacement schedule

6.   Technology policies and procedures manual

7.   Microsoft licensing implementation plan

8.   District website training sign-in sheet, September 19, 2012

Summary of Third Comprehensive Review, March 2012

The district continued to use Microsoft Access and Excel spreadsheets to maintain information on teacher credentialing, employee demographics and position control for budgeting. The district used three separate operating systems to manage staff and student information, which required manual input and lacked defined internal control and validation procedures. The county office was implementing a new software program countywide, with district implementation scheduled for 2013-14. Until that time, the county office offered to assist the district in entering position control data in the current system.

Summary of Fourth Comprehensive Review, March 2013

As the district transitions to the new Escape software system, management needs to be more involved with ensuring that appropriate training is provided to district employees. Data export and import routines must be developed to validate the accuracy of information during the first year of transition. In addition, the district is not in compliance with requirements for direct certification of students who are eligible for assistance programs.

Findings

1. As previously discussed, district staff members are training on the new countywide financial software system scheduled for implementation on July 1, 2013. The Escape system is fully integrated, which will eliminate the multiple operating systems that the district currently uses for position control, payroll, employee demographics, purchasing and general ledger accounting.

   As the district transitions to the new operating system, it will be imperative that the county office provide ample training and support. Training sessions are currently conducted at the county office weekly; however, district staff are concerned that they are unprepared to convert to the new system and that the implementation timeline does not allow sufficient time to complete the conversion of all data tables necessary for personnel, payroll and position control demographics. In addition, the budget, payroll and accounting personnel have had limited training to date. With the small number of personnel in the district office, it is difficult for these staff members to travel to the county office for weekly training and keep up with their assigned workloads. It would benefit the district to work with the county office to coordinate additional training sessions at the district office. In addition to intensive training, the district will need to establish methods to validate data during the first year.

2. The district exports data from its Microsoft Access database to the Aeries student information system and then to the state's CALPADS reporting module. The student information manager is the only district employee who is familiar with this procedure. The district does not have written verification or internal control procedures in place to validate that the data has been exported accurately. Employees need to be trained in the steps necessary to download and upload critical data elements from one system to another and validate the results.

3. The district's food service program must certify students who qualify for free and reduced-price meals within 30 days of the start of each school year. The County of Monterey has the ability to electronically transfer eligibility information for students of families on assistance programs including Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Food Distribution Program on Indian Reservations (FDPIR). This process, known as direct certification, allows the district to upload eligibility information that automatically qualifies these students without manually processing the National School Lunch Program and School Breakfast Program eligibility forms. Direct certification greatly reduces the time staff must spend manually processing forms each year.

   In accordance with federal regulations the district has been required, starting in the 2011-12 school year, to conduct direct certification with SNAP at least three times each school year. The district has the ability to run direct certification multiple times each school year and should use the following schedule to ensure federal program compliance:

   1. July 1

   2. The second week of school

3. Six months after the start of school

During this review period, the technology department processed the initial direct certification approximately four months after the start of the school year, because staff believed that this needed to occur after all the student information from Aeries was updated with data for new students. Because information on student eligibility must be updated within 30 days of the start of school, processing the direct certification after this time was not effective; this required food service staff to process all of the forms manually.

Recommendations for Recovery

The district should:

1. Work with the county office to coordinate additional, intensive Escape training sessions at the district office, and establish methods to validate data during the first year.

2. Ensure that more than one employee is trained in the functions required for exporting and importing student data among software systems until the new Escape system is fully installed and operational.

3. Ensure that written procedures and internal control verifications are in place to validate data export and import routines for each operation that involves the transfer of data.

4. Provide annual training to employees who are required to download and upload critical data elements from one system to another, including training in proper validation procedures.

5. Conduct direct certification using the recommended schedule to ensure federal program compliance.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

15.7   Management Information Systems

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.

Sources and Documentation

1.   Interviews with district staff

2.   District technology plan, July 1, 2010 – June 30, 2013

3.   Equipment inventory, August 1, 2011 – December 3, 2012

4.   Equipment replacement schedule

5.   E-Rate reimbursement notification letters, September and October, 2012

6.   E-Rate provider list

7.   Student eligibility for free and reduced-price meals

8.   Technology work orders, October 15, 2012

9.   Technology policies and procedures manual

Summary of Third Comprehensive Review, March 2012

Food service personnel were present during class schedule and textbook pick-up before the start of school to request that students turn in free and reduced-price meal applications. This was expected to increase meal eligibility and thus E-Rate funding. The director of technology reviewed requests for hardware purchases; however, given the district's financial position, purchases for technology were extremely limited. The technology department must continually monitor technology infrastructure, hardware and software to ensure support for instructional goals. Locating funding sources for technology was a major ongoing challenge.

Summary of Fourth Comprehensive Review, March 2013

The district has contracted with an experienced consultant to maximize E-Rate funding opportunities. Conducting the direct certification process throughout the school year would help provide eligibility for additional federal funding to support student needs. The district should

identify dedicated revenue sources to support improving its technology, upgrading infrastructure and replacing obsolete equipment.

Findings

1. The district has, with the assistance of an experienced consultant, successfully processed several applications for internet and telephone E-Rate reimbursements. Free and reduced-price meal counts correlate directly with the amount of E-Rate funding the district receives for telecommunications, internet connectivity, and wireless devices including phones and wide area network (WAN) cards. To further increase E-Rate funding, the district will need to maximize student eligibility for free and reduced-price meals by using the direct certification process described in Standard 15.3.

   Food service personnel continue to be present when students receive class schedules and textbooks at the beginning of the school year to offer assistance and request that students turn in completed free and reduced-price meal applications. This improves the ability of the food service staff to obtain the applications, address questions and increase E-Rate funding.

   The following list of approved 2011-12 E-Rate applications total $105,378.63:

   - Pacific Bell $101,477.30
   - AT&T Corp. $1,141.78
   - AT&T Mobility $909.84
   - Verizon Wireless $1,849.71

2. The district has developed a comprehensive technology policies and procedures manual during this review period. The manual is designed to complement and support the technology plan. The manual offers users guidance on many important topics including the following:

   - Identification of supported hardware, operating systems, network components and district applications.
   - Standard hardware: desktops, laptops, printers and multimedia devices.
   - Technology support and maintenance via the helpdesk.
   - Technology inventory and disposal of obsolete equipment.
   - File management, network locations, year-end procedures, backup systems and disaster recovery.
   - District email, email etiquette and internet usage.
   - Current board policies and administrative regulations.
   - Internet filtering.
   - Staff privileges and responsibilities, including the consequences for misuse.
   - Student privileges and responsibilities.

- Web page implementation, purpose and goals.

- Web publishing procedures.

- District and school site technology committees.

All hardware and software purchases conform to the district's technology manual and plan and must be approved by the information technology director prior to purchase. During this review period, a portion of unrestricted lottery funding was set aside to purchase a replacement email server.

3. During the previous review period, the district installed the latest version of the Linux operating system, which offers a wide variety of functions including a remote help desk and online computer repair service. The district is upgrading to GroupWise 2012, a messaging and collaborative software platform that includes email, calendars, document management and many other tools. GroupWise 2012 supports Windows and Linux servers and is more compatible with mobile devices.

4. The district's financial condition limits its ability to support new hardware and software purchases. Hardware and software requests that meet a high priority need are presented to the CBO for consideration and approval.

5. The district's technology infrastructure is the framework that supports the interconnectivity of hardware and software as well as the flow and processing of information. Ultimately, technology infrastructure supports the district's instructional goals. Students, staff and administrators rely on the operating systems and software applications to improve learning, collect and analyze data, produce financial information, and produce various state and federal reports.

A major challenge for the district is to identify the needs of all its constituents and establish a funding source that enables it to replace obsolete hardware, upgrade infrastructure, provide adequate bandwidth and attract qualified and experienced technology technicians in order to stay current with the ever increasing demand for service, training and support.

Recommendations for Recovery

The district should:

1. Continue contracting with an experienced consultant to ensure that it meets application deadlines and maximizes E-Rate and other external funding opportunities.

2. Continue efforts to identify all students who are eligible for free or reduced-price meals, and process the direct certification list from the county a least three times each year to meet students' needs and qualify the district for additional E-Rate funding.

3. Identify revenue sources to replace obsolete equipment and update the current infrastructure to support new technologies.

4. Ensure that technology technicians are sufficiently qualified and experienced to support existing and future technology needs.
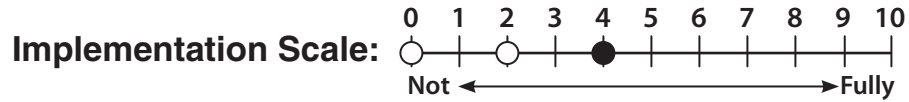
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

15.8   Management Information Systems

Professional Standard

An updated inventory includes item specification for use in 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.

Sources and Documentation

1. Interviews with district staff

2. District technology plan, July 1, 2010 – June 30, 2013

3. Equipment inventory, August 1, 2011 – December 3, 2012

4. Equipment replacement schedule

5. Technology work orders, October 15, 2012

6. Technology policies and procedures manual

Summary of Third Comprehensive Review, March 2012

The district hired a company to perform a physical inventory of all assets over $500. The district had a technology plan that identified the number of computers in each school and showed that more than 40% of the computers were more than four years old. The district did not have a plan or a funding source to replace obsolete computers and equipment, yet new software programs were continually added.

Summary of Fourth Comprehensive Review, March 2013

School sites have used restricted funding sources to purchase and upgrade computer systems and peripheral devices. However, the district has not developed a replacement schedule to support this endeavor and continues to report that more than 40% of its computers are more than four years old. The district does not have a dedicated revenue stream to support and complement the school site funding in this area. In addition, sensitive technology equipment lacks temperature monitoring sensors.

Findings

1. The district maintains a comprehensive inventory system for each school site. Using site allocations and restricted funding sources, schools were able to replace some obsolete computers and purchase some new printers, monitors, iPads, cameras, projectors, DVD players and scanners. However, more than 40% of the computers districtwide are still more than four years old.

2. Technology plays an important role in the students' education. Curricula that depend on the ability to use computers, peripheral devices and the internet are crucial to learning and educational success.

   Reliance on software, computers and network services for student data reporting, student assessments, student attendance, and parent notifications makes central office staff significantly dependent on the technology department for assistance and support to complete these functions.

3. Servers and other sensitive technology equipment that store data and support the infrastructure must be secured and maintained in a temperature-controlled environment. Dangerously high temperatures that occur when air conditioning units fail can cause irreversible equipment failure and data loss. During this review period, server equipment was moved to the King City High School campus and placed in an air conditioned room with no temperature monitoring sensor.

   For approximately five months each year King City's average temperature is above 80 degrees Fahrenheit, which is hot enough to cause a loss of critical district and student data if an air conditioning unit fails. The server room needs a temperature monitoring sensor that notifies an outside company or a staff member if the temperature rises above a set threshold. This will allow the situation to be rectified before data is lost.

4. A properly functioning technology department requires an appropriate number of skilled technicians and adequate funding to support new and existing technology. Therefore, it is important to identify a source of revenue to upgrade infrastructure and replace obsolete computers and equipment as needed.

Recommendations for Recovery

The district should:

1. Continue to update its equipment inventory and equipment replacement schedules.

2. Install a temperature monitoring sensor in the server room that notifies an outside company or a staff member if the temperature rises above a set threshold.

3. Continue to identify revenue sources to support the replacement of aging infrastructure and equipment.
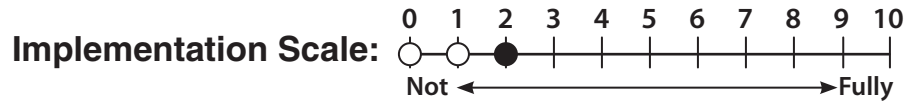
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

16.1   Maintenance and Operations Fiscal Controls

Legal Standard

Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.

Sources and Documentation

1. Interviews with the interim chief business official and district staff

2. Master inventory report, May 7, 2012

3. Annual audit report for the fiscal year ending June 30, 2011

4. Board meeting agendas and minutes

Summary of Third Comprehensive Review, March 2012

A physical inventory of fixed assets was completed in 2010-11. However, the district needs to implement procedures to ensure that all new equipment has an asset tag affixed and that the applicable information is entered on the master inventory report.

Summary of Fourth Comprehensive Review, March 2013

A physical inventory of fixed assets was completed in 2011-12, and staff reported that the district has implemented procedures to ensure that all new equipment has an asset tag affixed and that the applicable information is entered on the master inventory report. Board agenda items related to surplus property need to include information indicating whether the combined value of the items exceed $2,500 and the method to be used for disposal.

Findings

1. The district continued to contract with a vendor to complete a physical inventory of its fixed assets in 2011-12, and staff indicated that the district plans to complete a physical inventory every year. The master inventory report dated May 7, 2012 lists numerous categories of inventoried items, including audiovisual equipment, business machines, furniture, athletic and instructional equipment, custodial and maintenance equipment, and vehicles. However, as discussed in Standard 10.5, the district's June 30, 2011 audit report included audit finding 11-02 indicating that the district's capital assets were not auditable and audit finding 11-18 regarding the district's inadequate controls over capital assets and equipment purchased with federal funds. Finding 11-02 stated that the auditor's opinion would be qualified because the auditor could not determine whether capital assets and related accumulated depreciation were fairly stated. At the time of FCMAT's fieldwork, the June 30, 2012 audit report had not yet been completed.

2. Staff reported that the fiscal services manager sends a copy of purchase orders that include items to be tagged to the maintenance, operations, transportation and facilities

(MOTF) technician who is responsible for placing an asset tag on equipment that has a purchase price of $500 or more that is delivered to the warehouse or to school sites. The information technology director is responsible for placing an asset tag on technology equipment. These individuals are also responsible for entering data regarding newly acquired and surplused assets into the vendor-provided web-based asset inventory report.

3. Board meeting agendas and minutes for this review period include items regarding the disposal of some surplus property, including textbooks and technology equipment. District Board Policy and Administrative Regulation 3270, Sale and Disposal of Books, Equipment and Supplies; Education Code sections 17545, 17546 and 60500-60530; and California Code of Regulations, Title 5, sections 3944 and 3946 prescribe methods for disposing of district property. Some of these methods are predicated on whether the value of the property is more or less than $2,500. The board agenda and backup documentation provided to FCMAT did not include information regarding the value of the surplus property or the method to be used for disposal.

Recommendations for Recovery

The district should:

1. Continue to conduct a physical inventory of all fixed assets with a current market value of more than $500 at least once every two years.

2. Continue to implement procedures to ensure that all fixed assets are accounted for properly and have an asset tag placed on the item.

3. Continue to ensure that approval for the disposal of surplus property is included on the board agenda and that procedures to remove these items from the fixed asset inventory are followed.

4. Ensure that board agenda items related to surplus property include information indicating whether the combined value of the items exceed $2,500 and the method to be used for disposal.

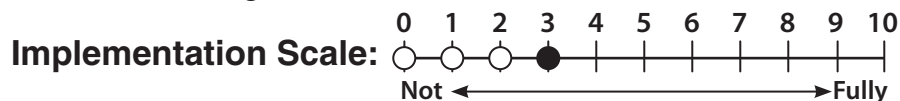## Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 3

Implementation Scale:

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        0   1   2   3   4   5   6   7   8   9  10
        ○───○───○───●───┼───┼───┼───┼───┼───┼
           Not ◄──────────────────────► Fully
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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.

Sources and Documentation

1. Interviews with district staff

2. Adopted budget, 2012 -13

3. Board and budget reports, cafeteria fund, July 1, 2012 – December 2, 2012

4. October 2012 district website menus for breakfast and lunch

5. School Nutrition Program claim for reimbursement summary, multiple months

6. National School Lunch Program, Coordinated Review Effort summation report, January 2012

7. National School Lunch Program, Coordinated Review Effort corrective action report, April 2012

8. Student counts for free, reduced-price and paid meals, November 30, 2012

9. Unaudited actuals report, 2011-12

10. Budget report, cafeteria fund, 2011-12

11. Labor hours and meal counts for each comprehensive high school, October 2012

12. Direct certification student list, October 7, 2012

Summary of Third Comprehensive Review, March 2012

The district completed the first year of operating its own food service program and experienced a significant loss that required a general fund contribution of $346,380. Effective January 1, 2011, the CDE's Nutrition Services Division approved the district's application for state and federal reimbursements. The food and nutritional services manager was instrumental in collecting free and reduced-price meal applications at the beginning of the 2011-12 school year. The district contracted with a food service provider for its meals and was working to improve selections.

Summary of Fourth Comprehensive Review, March 2013

Menu selections are lacking and the district needs to work with its contracted vendor to improve them. The food and nutritional services manager needs more training to properly analyze the financial aspects of the food service program to increase efficiency and reduce the need for contributions from the unrestricted general fund. Unauthorized and prohibited fund-raising on campus is in direct competition with the National School Lunch and School Breakfast programs, which jeopardizes program funding. The district needs to act immediately to stop these prohibited activities.

Findings

1. The district participates in the National School Lunch and Breakfast programs and contracts with Preferred Meal Systems, Inc., an outside vendor, to provide the meal plans and meals for breakfast and lunch.

   Although the vendor has been reluctant to make menu changes, the food and nutritional services manager made incremental progress with changing the standard vendor meal plan during this review period. However many individuals interviewed continued to have complaints regarding food selection and quality and lower than expected student participation rates.

   The menus for breakfast and lunch are posted on the district's website and include entrees, condiments and items that staff can order on the same page. The website offers a simple monthly menu in table format. Most entrees are offered daily such as cheese pizza wedge, hamburgers and hot dogs, and main entrees have limited appeal to high school students. The district and vendor would benefit from surveying students, revamping the menu selection, and refreshing the web page design. The relationship between the district and the vendor should be a partnership that provides nutritious meals and a menu that is appealing to students.

   The contract for Preferred Meals ends June 30, 2013. It would benefit the district to solicit a request for proposals (RFP) before issuing another contract for food service meals to help ensure that it is obtaining the lowest price and best service available.

2. The food service program underwent a Coordinated Review Effort (CRE) in January 2012. The findings were minimal, the required corrective action plan was approved by the California Department of Education (CDE), and the district met all program requirements in accordance with the National School Lunch Program.

3. Student eligibility counts for free and reduced- price meals for November 2012 indicate that 27.34% of King City High School students and 45.13% of Greenfield High School students are eligible. King City has a limited open campus policy, and Greenfield has a closed campus; however, this should not have a significant effect on the percentage of eligible students at the two schools.

Student Eligibility and Percentage of Enrollment As of November 30, 2012

School	Free	Reduced	Total	Enrollment	Percentage
King City HS	230	24	254	929	27.34%
Greenfield HS	376	27	403	893	45.13%
Portola-Butler	113	0	113	119	94.96%

Based on the above information provided by the district, a total of 770 students districtwide are eligible to receive free or reduced-price meals during the 2012-13 school year. This is a significant reduction compared to the 2010-11 data reported by the CDE, which indicates a total of 1,212 eligible students. Such a large decrease merits investigation.

Staff members at both comprehensive school sites have observed that the student participation rate is low, indicating that the menu selection and/or food quality is not appealing and needs to be improved. Districtwide meal counts for September, 2012 also indicate that the percentage of student participation is low, at only 35.81%.

Student Lunch Meals Served and Percentage of Enrollment September 2012 – 18 School Days

School	Free	Reduced	Paid	Total	Enrollment	Percentage
Districtwide Meals Served	11,032	1,109	352	12,493	1,941	
Average Daily Served Meals	613	62	20	695	1,941	35.81%

4. The food and nutritional services manager continues to have limited experience and training in the financial analysis of a food service program. The department manager has limited ability to provide input in the budget process, analyze financial reports, or calculate meals per labor hour and other statistical measurements necessary to analyze profitability and identify areas of concern.

5. Meals per labor hour (MPLH) is an industry standard measurement of food service efficiency. A minimum of 30 meals per labor hour is typical; however, many factors can affect this minimum. Taking into account that King City High School has a partially open campus during lunchtime, an MPLH of 25 would be a good initial goal for the district's high schools. As shown in the table below, the district had 17.75 MPLH for October 2012. This suggests that its food service program is overstaffed for the number of meals served. Evaluating the program efficiency monthly would help the district adjust staffing as needed.

Meals Per Labor Hour – October 2012

School	Average Student Meals Per Day	Meals Per Week	Labor Hours Per Week *	Meals Per Labor Hour (MPLH)
King City	420	2,100	120	17.5
Greenfield	340	1,700	95	18.0
TOTALS		3,800	215	17.75

*Five food service workers at King City High School and three at Greenfield High School

6. The cafeteria fund budget for 2012-13 does not reflect projected program income and expenditures in some categories, and it was forced to balance showing no contribution from the unrestricted general fund. Based on the information below, the district should revise the 2012-13 cafeteria fund operating budget to show local income from food sales, food expenditures and the unrestricted general fund contribution.

Comparison Analysis – Cafeteria Fund 2011-12 Unaudited Actuals to 2012-13 Adopted Budget

Category	2011-12 Unaudited Actuals	2012-13 Adopted Budget	Year-to-Date as of December 2, 2012 (Including Encumbrances)
Food Services Sales – Local	$62,189	$65,000	$0
Food - Expenditures	$416,935	$261,764	$253,831
Unrestricted General Fund Contribution	$145,989	$0	$0

The food and nutritional services manager needs the training to properly analyze the financial aspects of the food service program and should assist the district with ways to improve program efficiency and reduce general fund contributions to the program. The reported unrestricted general fund contribution to the food service program was $145,989 for the 2011-12 fiscal year, which is a substantial amount given the size of this program.

7. The district hired food service employees beginning in the 2010-11 fiscal year when it took over the National School Lunch and Breakfast programs. However, the district considers these employees hourly workers and they have not been included in the classified bargaining unit.

8. During fieldwork, FCMAT observed unauthorized fundraising activities on the King City High School campus that interfered with the food service program. One teacher was actively promoting candy sales during lunchtime. It was reported that the same teacher continues to promote fundraising events that directly interfere with the National School Lunch and School Breakfast programs. This is a clear violation of the program regulations and could jeopardize both federal and state funding, leaving the district to bear the total cost of providing meals to students who qualify for free and reduced-price meal assistance. Site administrators should be directed to prohibit fund raising activities on campus that directly compete or interfere with the National School Lunch and School Breakfast programs, except as prescribed by federal and state program regulations.

Recommendations for Recovery

The district should:

1. Work with its food service vendor to survey the students to improve food offerings, revamp the menu selection, and refresh the web page design.

2. Solicit a RFP before issuing another contract for food service meals.

3. Investigate the large decrease in student eligibility for free and reduced-price meals and the reasons for low participation in the food service program.

4. Provide training to the food and nutritional services manager so that this employee can properly analyze the financial aspects of the program, and hold the manager accountable to assist the district with ways to improve program efficiency and reduce encroachment.

5. Evaluate the food service program's efficiency and MPLH monthly, and make adjustments in staffing as needed.

6. Contact its legal counsel regarding the proper classification of food service workers.

7. Direct its school site administrators to prohibit fund-raising activity on campus that does not comply with federal and state regulations for the National School Lunch and School Breakfast programs.
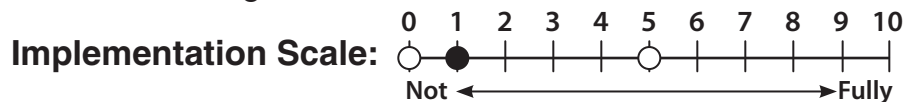
Standard Partially Implemented

February 2010 Initial Rating: 5

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

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20.1   Special Education

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.

Sources and Documentation

1. Interviews with the interim chief business official and district staff

2. Special education budget reports, 2010-11, 2011-12 and 2012-13

3. Unaudited actuals special education maintenance of effort reports, 2011-12

Summary of Third Comprehensive Review, March 2012

The district had reduced its special education expenditures by approximately $504,307 in 2010-11. However, the district was provided and used $418,747 in one-time federal American Recovery and Reinvestment Act (ARRA) funding during fiscal year 2009-10, which inflated expenditures in that year. The unaudited actuals report indicated that the district met its 2010-11 and projected to meet its 2011-12 maintenance of effort (MOE) requirements.

Summary of Fourth Comprehensive Review, March 2013

The district reduced its special education expenditures by approximately $374,099 in 2011-12. However, $62,260 in one-time federal American Recovery and Reinvestment Act (ARRA) funding was used during fiscal year 2010-11, which may have inflated expenditures in that year. The unaudited actuals report indicates that the district met its 2011-12 and projects to meet its 2012-13 maintenance of effort (MOE) requirements; however, the special education director needs to be involved in the MOE calculation process and provided with access to FMS and the training necessary to become familiar with the special education budget.

Findings

1. The district's special education budget reports for the current and two previous fiscal years indicate the following:

	Unrestricted General Fund Contribution	Total Expenditures
2010-11 unaudited actuals: resources 3310, 3313, 6500	$1,305,204	$2,630,440
2011-12 unaudited actuals: resources 3310, 6500	$933,038	$2,256,341
2012-13 projected budget: resources 3310, 6500	$1,348,549	$2,239,658

The 2011-12 unaudited actuals budget report indicates an overall reduction in special education expenditures of $374,099 from fiscal year 2010-11. However, 2010-11 unaudited actuals include $62,260 in one-time federal revenue from the American Recovery and Reinvestment Act (ARRA) (resource 3313), which may have slightly inflated expenditures in that year. The 2012-13 adopted budget projects a decrease in special education expenditures of $16,683 from 2011-12.

2. The district's 2010-11 and 2012-13 budgets indicate that revenue limit funds for special education students were not transferred to the special education resource (6500). The California School Accounting Manual (CSAM) provides for the transfer of revenue limit funds to special education using object code 8091 and states the following:

> 8091   Revenue Limit Transfers—Current Year. Record transfers of Revenue Limit Sources to applicable restricted resources, such as special education or continuation education, in the general fund or other funds. This account should net to zero LEA-wide.

Because the district did not transfer revenue limit funds to resource 6500 in fiscal years 2010-11 and 2012-13, the unrestricted general fund contribution amounts included in the table above for those years are inflated.

3. The district's 2012-13 projected budget does not include estimated receipts for other state revenue or interagency services between LEAs, although the 2010-11 and 2011-12 unaudited actuals include receipts from these two funding sources. The 2012-13 projected budget also shows a negative balance for classified employees' salaries as of December 2, 2012.

4. In 2010-11, the district began operating two classes for severely handicapped students that formerly were operated by the county office. During this review period, interviews indicated that the class for moderately to severely handicapped students at Greenfield High School was operating well. However, the transition program that was located at King City High School was moved to the Soledad Transition Program beginning with the 2012-13 school year. The district has not yet calculated the actual savings and/or costs for these program changes.

5. The 2011-12 actual and 2012-13 budget special education MOE reports, SEMA and SEMB, respectively, indicate that the district met its MOE requirement in 2011-12 and is projecting to meet its MOE requirement in 2012-13. However, interviews indicated that the special education director is not involved in the MOE calculation process and is not familiar with the special education budget or the unrestricted general fund contribution amount.

6. The district is not charging the state-approved indirect cost rate to the special education resources. Indirect costs need to be calculated and charged to all restricted programs as allowable to accurately show total program costs.

7. Beginning July 1, 2012, the district contracted with a different outside service provider to complete the forms necessary to receive reimbursement for Medi-Cal

Administrative Activities (MAA). However, the district has not contracted with an outside service provider to process reimbursement claims for the Local Educational Agency Medi-Cal billing option (LEA). In addition, interviews indicated that the special education director has not yet been involved in the MAA billing process.

8. Education Code Section 56362 provides for a maximum caseload of 28 students per resource specialist teacher. However, Education Code Section 56101 and California Code of Regulations, Title 5, Section 3100 provide for districts to request a waiver from the State Board of Education that allows the caseload to be increased to 32 students. Staff indicated that the district was granted a resource specialist caseload waiver in 2011-12 but that a waiver is not needed for 2012-13.

Recommendations for Recovery

The district should:

1. Continue to review all special education programs to optimize staffing allocations and workloads.

2. Continue to review contracted special education services provided by outside agencies to determine if the district can provide these services at a lower cost.

3. Ensure that revenue limit funds for special education students are transferred from the unrestricted general fund to special education.

4. Review the 2012-13 budget line items for other state revenues, interagency services between LEAs, and classified salaries to ensure that they are projected accurately.

5. Evaluate the savings and/or costs for the two special education classes taken back from the county office.

6. Review each bill from the county office to ensure that the district is being charged accurately for students who remain in county office-operated programs.

7. Include the special education director in the MOE calculation process, and ensure the director has online read-only access to the FMS system and the training needed to review the special education budget.

8. Calculate and charge the allowable indirect costs to all restricted programs to accurately show total program costs.

9. Include the special education director in the MAA billing process, and continue to assess whether reimbursement claims should be filed for Medi-Cal LEA services the district provides.

10. Continue to assess whether a waiver needs to be requested from the State Board of Education to allow resource specialists' caseloads to be increased to 32 students.
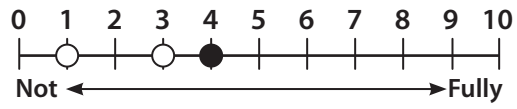
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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21.1   Transportation

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.

Sources and Documentation

1. Interviews with the interim chief business official and district staff

2. Transportation budget reports, 2010-11, 2011-12 and 2012-13

Summary of Third Comprehensive Review, March 2012

Transportation costs were reduced $88,907 in 2010-11; however, approximately $65,000 of this reduction was the result of an increase in the direct costs charged to other district programs for transportation services. The district needed to continue to assess routes for maximum efficiency.

Summary of Fourth Comprehensive Review, March 2013

Transportation expenditures were reduced by $114,653 in 2011-12; however, the district needs to ensure that all drivers, including substitutes, are charged to the transportation budget. The district should continue to assess routes for maximum efficiency and evaluate the costs for transportation services provided by the county office and outside vendors to determine if the district could provide them more cost effectively.

Findings

1. The district's transportation budget reports for the current and two previous fiscal years indicate the following:

	Unrestricted General Fund Contribution	Total Expenditures
2010-11 unaudited actuals	$233,711	$556,294
2011-12 unaudited actuals	$99,344	$441,641
2012-13 projected budget	$64,116	$380,908

The district's budget reports show a reduction of $114,653 in transportation expenditures from fiscal year 2010-11 to 2011-12, and a projected reduction of $60,733 from 2011-12 to 2012-13. The budget reports further indicate that a majority of the savings is from classified employee salaries and benefits costs. The 2011-12 and 2012-13 reports do not include budget items for direct costs charged to other district programs for field trips, and interviews indicated that outside vendors provide transportation for field trips and athletic trips.

2. In 2010-11, the district began operating two classes for severely handicapped students that formerly were operated by the county office. As discussed in Standard 20.1, one of these classes is now operated by the Soledad Transition Program. Although the district anticipated providing transportation services for these students, it has been unable to fill part-time bus driver positions and continues to contract with the county office to transport its special education students.

3. Interviews indicated that the district's mechanic drives a daily bus route and that maintenance staff who have bus driving certificates are often called on as substitutes drivers for bus routes. The district needs to ensure that all its bus drivers, including substitutes, are charged to the transportation budget to accurately account for program costs.

4. The district is combining its costs for transporting special education students with its costs for regular home-to-school transportation in resource 7230 and/or the special education resource 6500. The CSAM provides the following guidance regarding accounting for the transportation costs of special education students:

> Costs of providing specialized transportation services (e.g., buses with wheelchair lifts, aides who accompany children on the bus) specified in IEPs of special education pupils who are severely disabled or orthopedically impaired are reported in Goal 5750, Special Education, Ages 5–22 Severely Disabled. If the LEA receives a state transportation apportionment, these costs are normally reported in Resource 7240, Transportation: Special Education (SD/OI). If these costs are initially accumulated in Resource 7230, Transportation: Home to School, they are to be transferred to Resource 7240, Goal 5750, using Object 5710, Transfers of Direct Costs.

> Costs of providing transportation services specified in IEPs of special education students who are not severely disabled or orthopedically impaired are reported in special education goals other than 5750. These costs are normally reported in Resource 7230, Transportation: Home to School, if the LEA receives a state transportation apportionment.

5. The district is not charging the state-approved indirect cost rate to the transportation program. Indirect costs need to be calculated and charged to all restricted programs as allowable to accurately show total program costs.

Recommendations for Recovery

The district should:

1. Continue to assess bus routes to achieve maximum efficiency and reduce transportation expenditures.

2. Require the maintenance, operations, transportation and facilities director to review all proposed transportation services before they are included in special education students' individualized education programs (IEPs) to ensure maximum efficiency.

3. Ensure that the costs for the special education bus routes provided by the county office are included in the budget, and review each invoice to ensure that the district is charged appropriately.

4. Evaluate the costs for transportation services provided by the county office and outside vendors to determine if the district can provide them more cost effectively.

5. Ensure that all bus drivers, including substitutes, are charged to the transportation budget to accurately account for program costs.

6. Review the CSAM guidance regarding accounting for special education transportation costs and record applicable expenses as indicated.

7. Calculate and charge the allowable indirect costs to all restricted programs to accurately show total program costs.
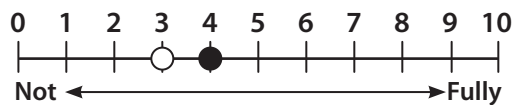
Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

Implementation Scale:

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22.1   Risk Management – Other Post-Employment Benefits

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)

Sources and Documentation

1. Interviews with the interim chief business official and district staff

2. Actuarial study of retiree health liabilities as of October 1, 2011

3. Annual audit report for the fiscal year ending June 30, 2011

Summary of Third Comprehensive Review, March 2012

The district offered a defined benefit healthcare plan, administered by the district, for retirees' health and dental coverage. According to the audited financial statements dated June 30, 2010, ten retirees and their dependents were receiving benefits, as were 127 active plan members. The district was in compliance with GASB requirements to complete the actuarial calculations for post-employment benefits. A new actuarial study was required by June 30, 2012.

Summary of Fourth Comprehensive Review, March 2013

The district is in compliance with GASB Statement No. 45 requirements. The latest actuarial report indicates that 113 employees and 10 retirees participate in the defined benefit healthcare plan. The district continues to fund the post-employment benefits using the pay-as-you-go method.

Findings

1. The district continues to participate in the Monterey County Schools Insurance Group (MCSIG) for health insurance. The district contributes an annual maximum of $10,000 per employee for medical insurance premiums and offers a prorated contribution for part-time employees who work at least four hours per day. Employees select coverage from one of three plans and may elect to pay for additional coverage for dependents.

2. The district's most current actuarial study for post-employment benefits, dated December 29, 2011, was prepared by Total Compensation Systems, Inc. and estimated the annual required contribution (ARC) at $238,461 as October 1, 2011 for 113 employees and 10 retirees.

   The ARC is an estimate of normal costs plus the annual unfunded actuarial accrued liability (UAAL) and may be higher than the annual pay-as-you-go cost depending on a number of criteria. The ARC is used to determine the amount necessary for the

district to fully fund the annual projected cost of post-employment benefits given certain assumptions over a 30-year period. The primary consideration is the balance of the amortized unfunded liabilities for active and retired employees. The following estimates are in compliance with GASB Statement No. 45, according to the actuarial report.

Annual Required Contribution (ARC) Year Beginning October 1, 2011	
Normal Cost	$155,008
Initial UAAL Amortization	$121,486
Residual UAAL Amortization	($38,033)
ARC	$238,461

According to the actuarial report, the annual pay-as-you-go costs are estimated to be $95,324 beginning October 1, 2011, and are projected to grow to $178,141 by October 1, 2020. The district has elected to fund the pay-as-you-go portion at this time given its financial condition. Although it is acceptable to use this method, alternative methods should be considered to fully fund the ARC.

3. The district has participated in the California State Teachers' Retirement System's Golden Handshake program. As of June 30, 2011, outstanding obligations were $226,574, including interest. These obligations are paid from the district's general fund on a pay-as-you-go basis. The obligations are scheduled to be paid in full in fiscal year 2014-15.

Recommendations for Recovery

The district should:

1. Continue to obtain periodic actuarial studies for other post-employment benefits as required by GASB, and review them for changes in the number of employees and retirees eligible for post-employment benefits.

2. Include methods that will fully fund the ARC in its fiscal solvency plan.
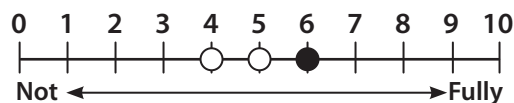
Standard Partially Implemented

February 2010 Initial Rating: 4

March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 6

Implementation Scale:

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      Not ←                    → Fully
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22.2   Risk Management – Other Programs

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.

Sources and Documentation

1. Interviews with the interim chief business official and district staff

2. Monterey County Schools Joint Powers Authority actuarial review of the self-insured workers' compensation program, May 2010

3. Monterey Educational Risk Management Authority – statistical reports of workers' compensation claims, November 19, 2012

4. California Occupational Safety and Health Administration (Cal/OSHA) Form 300A – Annual Summary of Work-Related Injuries and Illnesses, January 10, 2012

5. SafeSchools training assignment compliance, 2011-12

6. Hazardous materials report, May 2012

Summary of Third Comprehensive Review, March 2012

The district continued to be proactive and monitor training activities in an effort to reduce potential claims. With the assistance of Keenan and Associates, the district had several online venues for employees to complete mandatory annual trainings. Online programs track all employee training and results. Worker's compensation insurance was provided through the Monterey County School's Workers' Compensation Joint Powers Authority (JPA). Property and liability insurance coverage was provided through a separate JPA pool that covers Monterey and San Benito counties.

Summary of Fourth Comprehensive Review, March 2013

The district continues to provide online training for employees to help reduce workers' compensation claims and minimize liability. These efforts contribute to stabilizing rates and costs. The 2012 hazardous materials report identifies specific areas of concern, and the district should address these issues immediately.

Findings

1. The workers' compensation JPA provides actuarial studies that identify risk exposure and establish a program rate recommendation to a confidence level authorized by the JPA. The actuarial study is intended to manage the costs and liabilities, communicate the financial implications, and comply with GASB Statement No. 10.

   Districts that participate in the Monterey County Schools Workers' Compensation JPA program pay a premium based on an individual rate. An equity pooling fund is established to ensure that each participating district shares equally in the overall performance of the JPA, which is administered by Monterey Educational Risk Management Authority. For fiscal year 2010-11, the JPA recorded payroll of $298,436,700, a reduction of $27,853,100 from 2009-10, and a total estimated claims loss of $7,409,000 including claims administration costs, which is a reduction of $134,000.

   Based on the ratio of outstanding claims to program assets, the program was funded slightly less than 70% confidence level as of June 30, 2010. The program administrator is recommending increasing the confidence level to 80%. The recommended rate to achieve an 80% confidence level for 2011-12 increases from $2.09 to $3.14 per $100 of payroll.

   The district had 13 open claims and reported a total open claims liability of $821,410 as of October 31, 2012. According to the annual Cal/OSHA worker injury report dated January 10, 2012, the district incurred seven work related injuries during the reporting period.

2. The district continues to place a high priority on cost containment and prevention measures and offers online mandatory and voluntary training for district employees. The district provides online training courses developed by Keenan and Associates, which include the following:

   - Diversity awareness
   - Sexual harassment
   - Blood-borne pathogens
   - Chemical hazards
   - Safety data – lifts, disruptive behavior, transfer or movement for paraeducators
   - Chemical storage and handling

   The program generates a list of employees who are required to have specific training and notifies these employees by emailing them a link to the training modules. Upon completion of a module, the test results are sent to the district's personnel office.

3. The district contracts with the Monterey and San Benito Counties Liability and Property JPA for insurance that covers losses due to theft, damage to assets, errors and omissions. The JPA commissioned an actuarial report in 2010; however, the JPA has not issued an updated report since that time.

4. The May 2012 hazardous materials survey prepared by Keenan & Associates includes the following list of hazardous conditions including storage, labeling and other safety measures, which are deficiencies that must be remediated to achieve compliance with Cal/OSHA regulations regarding chemicals in the workplace.

District Maintenance Facility

- Bus Garage:

  - Improper storage of chemicals in secondary containers without proper labeling.

  - Improper mounting for the fire extinguisher.

- Tool Room

  - Numerous flammable liquids stored on shelves not properly contained in an approved flammable cabinet.

- Warehouse

  - Flammable liquids stored on shelves not properly contained in an approved flammable cabinet that is properly vented.

  - Large containers without complete labeling; one contains hydrochloric acid.

King City High School

- Chemistry Storage Room, 101

  - Nitric acid is not separated from acidic acids or in an isolated compartment.

  - Many instances where chemicals are stored in secondary containers without proper labeling.

  - Ethyl alcohol currently stored on shelves should be contained in an approved flammable cabinet.

  - Incomplete labeling on a bag containing copper sulfate.

- Biology Storage Room 115

  - Storage room should include a flammable cabinet that is properly ventilated.

  - Hydrochloric acid is stored outside of an acid cabinet.

  - Food is being prepared and consumed in the biology preparation area.

- Auto Shop

  - This program is not currently in operation; however, there is a flammable cabinet that contains expired product materials that must be disposed of and containers without lids to contain materials.

<u>Greenfield High School</u>

- Custodial Rooms

    - Storage room needs a flammable cabinet. Flammable liquids are stored on pallets.

- Maintenance Yard

    - Gasoline is stored in a gas can on a pallet and must be properly segregated and ventilated.

- Chemistry Storage Room, 105

    - Sulfuric acid is stored in secondary containers without proper labeling.

    - Acids are stored on shelves and must be stored in a dedicated acid cabinet.

    - Amyl acetate is stored on an open shelf rather than a flammable cabinet that is properly vented with self-closing doors.

5. The CBO attends JPA meetings when possible. These meeting offer beneficial information regarding current claims and trends, which enables the district to respond to a particular area of concern quickly.

Recommendations for Recovery

The district should:

1. Continue developing and monitoring the online training programs.

2. Review the 2012 hazardous materials survey report findings for specific areas of concern and address these issues immediately.

3. Continue working closely with the workers' compensation and property/liability insurance program JPAs to ensure that the district is implementing preventive measures to minimize property and liability losses.

Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4
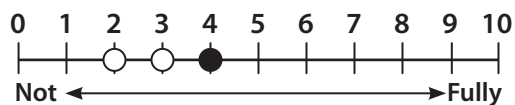
Implementation Scale:

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       Not ◄———————————————► Fully
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Table of
Financial Management Ratings

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
1.1	PROFESSIONAL STANDARD – INTERNAL CONTROL ENVIRONMENT All governing 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. (State Audit Standard (SAS) 55, SAS 78, SAS 82: Treadway Commission)	1	2	2	2
1.3	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)	3	4	4	4
2.1	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.	0	3	4	4
2.3	PROFESSIONAL STANDARD – INTER- AND INTRADEPARTMENTAL COMMUNICATIONS The Governing 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.	1	4	4	4
3.1	PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT 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.	1	1	1	1

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
3.2	PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT 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	1	1	2
5.1	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The Governing 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 Governing Board avoids specific line-item focus, but directs staff to design an entire expenditure plan focusing on student and LEA needs.	2	4	4	4
5.2	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.	3	3	3	3
5.3	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS 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. A budget calendar contains statutory due dates and major budget development milestones.	2	3	3	3
5.4	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The LEA has policies to facilitate development of a budget that is understandable, meaningful, reflective of the LEA's priorities, and balanced in terms of revenues and expenditures. 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.	1	1	1	0

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
6.1	LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS The LEA adopts its annual budget within the statutory timelines established by EC 42103, which requires that on or before July 1, the governing 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 Governing Board shall file that budget with the county superintendent of schools. (EC 42127(a))	2	5	8	9
6.2	LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS 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(2) and 42127(i)(4))	2	6	8	5
6.3	LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS 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.	3	6	6	6
7.2	PROFESSIONAL STANDARD – BUDGET MONITORING 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 Governing Board.	2	3	3	3
7.3	PROFESSIONAL STANDARD – BUDGET MONITORING 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.	1	4	5	5

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
8.1 PROFESSIONAL STANDARD – ACCOUNTING 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.	1	2	3	3
8.2 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.	2	4	3	3
9.2 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.	3	4	4	4
9.3 PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Policies and regulations exist for independent study, charter, home study, inter-/intra-LEA agreements, LEAs of choice, and ROC/P and adult education, and address fiscal impact.	1	1	2	2
9.4 PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.	3	4	4	4
9.6 PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.	1	6	7	7
9.7 PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.	1	5	5	6

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
10.4 PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING 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.	2	2	2	1
10.5 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.	1	1	1	1
11.1 LEGAL STANDARD – STUDENT BODY FUNDS The Governing 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)	0	0	1	2
11.3 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.	0	0	0	2

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
12.1 LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS 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)	1	3	4	4
12.2 LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS 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)	1	4	4	4
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)).	1	4	3	2
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)	1	4	4	3

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
14.3 PROFESSIONAL STANDARD – IMPACT OF COLLECTIVE BARGAINING 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.	2	6	6	7
15.2 PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS 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.	3	4	5	6
15.3 PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS 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.	0	1	1	1

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
15.7 PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS 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.	0	0	2	4
15.8 PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS An updated inventory includes item specification for use in 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.	0	0	1	2
16.1 LEGAL STANDARD – MAINTENANCE AND OPERATIONS FISCAL CONTROLS Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.	0	1	2	3
17.1 PROFESSIONAL STANDARD – FOOD SERVICE FISCAL CONTROLS 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.	5	0	1	1
20.1 PROFESSIONAL STANDARD – SPECIAL EDUCATION 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	3	4	4

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 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.	3	3	3	4
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)	4	5	6	6
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.	2	3	4	4
Collective Average Rating	**1.54**	**2.93**	**3.39**	**3.54**

The collective average ratings for all years are based on the subset of priority standards used in this fourth comprehensive review.

Facilities Management

1.1   School Safety

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)

Sources and Documentation

1. Board policies and administrative regulations

2. Interview with state administrator

3. Interview with the director of maintenance, operations, transportation and facilities (MOTF)

4. Interviews with school site principals

5. Interview with the human resources administrator

6. Site evacuation plans

7. Employee safety training records

8. Injury and illness prevention plan (IIPP)

9. Site visits

Summary of Third Comprehensive Review, March 2012

The district updated Board Policy 3516, Emergencies and Disaster Preparedness, and showed evidence of emergency preparedness training, but had not yet updated its emergency preparedness plan.

Summary of Fourth Comprehensive Review, March 2013

The district has not yet updated plans regarding emergency and disaster preparedness and has made no progress on this standard.

Findings

1. King City High School was developing and implementing a new school site safety plan, however it could not be located since the former principal resigned in August 2012.

2. FCMAT identified a comprehensive emergency preparedness plan dated 2007 posted on the multipurpose room wall at Greenfield High School.

3. Board Policy and Administrative Regulation 0450 regarding the comprehensive safety plan were last updated and adopted in June 2012.

4. Board Policy, Administrative Regulation and Exhibit 3515 regarding campus security to provide a school environment that promotes the safety of students, employees and visitors through campus security measures were last updated in September 2010.

5. Board Policy and Administrative Regulation 3516, regarding emergencies and a disaster preparedness plan, were adopted in January 2011.

6. This policy states that the superintendent shall develop and maintain a disaster preparedness plan that details provisions for handling emergencies and disasters and that shall be included in the district's comprehensive school safety plan in accordance with Education Code section 32282.

7. According to Administrative Regulation 3516, the plan shall address fire which endangers students and staff; earthquake and other natural disasters; environmental hazards; attack or disturbance by individual or group; bomb threat and detonation; biological, radiological, chemical, and other activities; and medical emergencies or quarantines. The superintendent shall ensure that the district's procedures include strategies and actions to prevent, mitigate, prepare, respond and recover, such as regular inspections of facilities and equipment; instruction and practice for students and employees; determination of staff roles and responsibilities; personal safety and security; closure of schools; communication to staff, parents and/or guardians, the governing board, and the media; cooperation with other state and local agencies; and steps to be taken after the disaster or emergency.

8. The district's current emergency preparedness plan was updated in 2007. The plan does not include all the elements identified in the updated board policy. The plan's emergency contact information is incorrect because of staff changes and other changes in contact information.

Recommendations for Recovery

The district should:

1. Update its emergency preparedness plan, following Board Policy and Administrative Regulation 3516, and ensure that the information included is current and accurate.

2. Update its comprehensive safety plan and Board Policy and Administrative Regulation 0450 as needed.

3. Ensure that all site administrators attend training regarding emergency and disaster response, and that they understand their roles and responsibilities during an emergency.

4. Ensure that each site maintains an up-to-date emergency preparedness plan that is specific to the site and that aligns with the district's plan and addresses all the strategies and actions identified in relevant board policies.

5. Ensure that emergency preparedness plans are communicated to staff and students and that drills are conducted regularly to ensure understanding and preparedness.

6. As an accountability measure, require that all committee meetings, training and drills related to this standard be thoroughly documented and reported to the district.
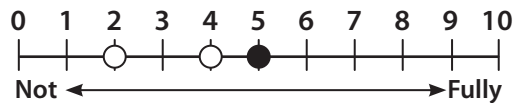
Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

Implementation Scale:

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      |--+--O--+--O--●--+--+--+--+--|
      Not ◄─────────────────► Fully
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1.3   School Safety

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)

Sources and Documentation

1. Board policies and administrative regulations

2. Interview with the state administrator

3. Interview with the director of MOTF

4. Interview with the site principals

5. Interview with the human resources administrator

6. Site evacuation plans

7. Employee safety training records

8. Injury and illness prevention plan (IIPP)

9. Site visits

Summary of Third Comprehensive Review, March 2012

The district still had not developed a comprehensive districtwide safety plan. The district had provided school safety training to some staff members.

Summary of Fourth Comprehensive Review, March 2013

The district has not developed a comprehensive districtwide safety plan. The district is providing various types of safety training for its employees, but has no coordinated or comprehensive plan for employee safety training. There is newly implemented online safety training through the human resources department, as well as some safety training provided by outside vendors and consultants.

Findings

1. Board Policy and Administrative Regulation 0450 regarding a comprehensive school safety plan were adopted in April 2005 and have not been updated.

2. The district has not complied with Board Policy 0450, which requires that each school site council write and develop a comprehensive school safety plan relevant to the needs and resources of that particular school site. The policy defines the requirements of the

plan, including a review and update by March 1 of each year and the requirement for board review and approval.

3. Board Policy 3516, regarding emergencies and a disaster preparedness plan, was updated in January 2011. The policy requires the superintendent to develop and maintain a disaster preparedness plan that details provisions for handling emergencies and disasters and that is included in the district's comprehensive school safety plan. The district's most current emergency preparedness plan was last updated in 2007.

4. Employees have received training in the use of hazardous chemical safety, fire extinguisher safety, and forklift safety. Employees are also receiving electrical safety and ladder safety training as part of their new online training system through the human resources department.

5. Safety training pertaining to fire extinguishers, hazardous materials handling and forklift safety was provided to custodial and maintenance staff in July and August 2012.

6. Material safety data sheet (MSDS) safety training was provided by American Supply Company in July 2012.

7. The IIPP has not been fully implemented.

8. School site principals indicated that student safety was their greatest concern because of the amount of violent crime occurring in the community.

Recommendations for Recovery

The district should:

1. Update and implement the comprehensive school safety plan as outlined in Board Policy and Administrative Regulation 0450 to adhere to legal requirements and the district's needs.

2. Develop a districtwide comprehensive safety plan that includes school site plans and disaster preparedness plans.

3. Consider forming a district safety committee to help develop and support district safety plans.

4. Establish site safety committees and ensure they meet regularly to review and communicate school safety issues and update the safety plan accordingly.

5. Ensure adherence to current board policies regarding annual review and update of the comprehensive safety plan.
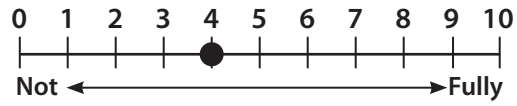
Standard Partially Implemented

February 2010 Initial Rating: 4

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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   Not ◄──────────────────► Fully
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1.8   School Safety

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)

Sources and Documentation

1. Board policies

2. Site evacuation plans

3. Interview with the state administrator

4. Interview with the director of MOTF

5. Interviews with school site principals

6. Job descriptions

7. Cleaning standards documents

8. Facilities inspection tool (FIT) forms

9. Site visits

Summary of Third Comprehensive Review, March 2012

The district had reorganized the custodial department. New job descriptions and work schedules had been implemented. The cleanliness of school campuses had improved; however, areas of considerable debris and deterioration remained.

Summary of Fourth Comprehensive Review, March 2013

The district has reorganized the supervision of the custodial, maintenance, and groundskeeping personnel under the school principals, and some new work schedules have been implemented. The cleanliness of the school campuses has improved considerably in the past year.

Findings

1. The district has given responsibilities for supervision and evaluation of the custodial, maintenance and groundskeeping personnel at the high schools to the principals.

2. The director of MOTF is no longer responsible for developing work assignments or work schedules for personnel at the high school campuses.

3. King City High School and Greenfield High School show dramatic improvement in overall cleanliness. Many areas of the campuses, such as areas near the playfields and perimeter fencing, have improved since prior reviews. However, the district continues to lack a comprehensive pest management and weed abatement plan.

4. Custodial standards and training in the standards have been implemented.

5. Deficiencies noted on the Williams Facilities Inspection Tool (FIT) have been corrected regularly.

6. The April 2012 FIT rated both Greenfield High School and King City High School as in good repair with no items in need of emergency attention. Only the category of interior surfaces (floors, walls, ceilings and countertops) of Greenfield High School was given a rating of "fair."

7. The director of MOTF no longer conducts regular monthly walk-through site visits with the site administrators.

8. The fence along the northern perimeter of Greenfield High School remains a hazard. The fence is owned by the adjacent private property owners and is broken in many places, allowing students or other individuals to pass freely between the school and adjacent private properties.

Recommendations for Recovery

The district should:

1. Re-establish regular walk-through site visits at each campus and ensure communication between the site administration and the director of MOTF to maintain a list of items or areas that need maintenance and repair. The state administrator should review the list and help prioritize projects.

2. Continue to implement custodial standards, including staff training and accountability.

3. Review the maintenance and groundskeeping schedules, workload, and work completed to identify potential productivity improvements.

4. Develop maintenance and groundskeeping standards to establish productivity and work quality expectations. Provide training on and accountability for these standards.

5. Develop and implement a proactive, integrated pest management and weed abatement plan.

6. Install a permanent chain-link fence along the northern perimeter of Greenfield High School to prevent students or other individuals from entering or exiting the campus through openings in the privately owned fence.

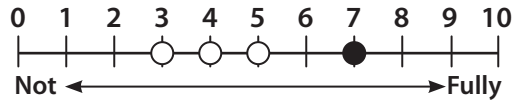## Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

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    Not ←———————————————→ Fully
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1.9 School Safety

Legal Standard

The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)

Sources and Documentation

1. Injury and Illness Prevention Plan (IIPP)

2. Monterey County Schools Insurance Group Property and Liability Joint Powers Authority (JPA) property and liability inspection report

3. Monterey County Schools Insurance Group Property and Liability JPA hazardous materials survey

4. Facilities inspection tool (FIT) forms

5. Interview with the director of MOTF

Summary of Third Comprehensive Review, March 2012

The district adopted the Illness and Injury Prevention Plan (IIPP) in January 2011. The plan had not yet been completely implemented.

Summary of Fourth Comprehensive Review, March 2013

The district has not fully implemented its Injury and Illness Prevention Plan (IIPP). The district is providing some regular safety training in accord with the plan, and some regular safety inspection is occurring as recommended in the plan.

Findings

1. The district has made no changes to its IIPP, which was adopted in January 2011.

2. The IIPP has not been fully implemented. Safety inspection reports have been completed as required as part of the Williams facilities inspection process and through the Monterey County Schools Insurance Group Property and Liability JPA inspection process. No employee reports of hazards or hazardous conditions have been received; no records have been kept of responses and corrections made as a result of identified unsafe conditions; no training verification forms have been completed acknowledging awareness of the IIPP; and no safety meeting reports are on file.

3. Employees have received safety training in the use of hazardous chemicals, fire extinguishers and forklifts. The employees are also receiving electrical safety and ladder safety training as part of their new online training system through the human resources department.

4. The district's facilities are inspected once per year by a loss control consultant as part of the Monterey County Schools Insurance Group JPA annual inspection process. The district is also inspected by the Monterey County Office of Education as part of its required Williams inspection of facilities to identify unsafe conditions.

5. A hazardous materials inspection was completed by the district and the JPA in April 2012.

6. There was no record of formal safety inspections by the district other than the Williams inspections.

Recommendations for Recovery

The district should:

1. Continue to implement the IIPP as adopted.

2. Communicate to all employees that the IIPP is in effect and its importance to the district and employees.

3. Work with the human resources department to expand the amount of online IIPP-related safety training available to employees.

4. Establish accountability measures, including review of safety inspection, incident and training reports by the appropriate executive administrator.

5. Develop a schedule for district personnel to conduct comprehensive school safety inspections at least three times per year.
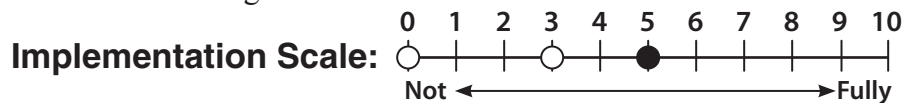
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 5

Implementation Scale:

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1.15   School Safety

Legal Standard

The LEA maintains updated Material Safety Data Sheets for all required products. (LC 6360-6363; CCR Title 8, Section 5194)

Sources and Documentation

1. Board Policy and Administrative Regulation 3514.1

2. Observations of custodial storage locations

3. MSDS binders located at sites

4. Interview with the director of MOTF

5. MSDS safety training records

Summary of Third Comprehensive Review, March 2012

The district had updated and adequately maintained MSDS binders and performed regular training regarding their use.

Summary of Fourth Comprehensive Review, March 2013

The district has continued to adequately update and maintain the MSDS binders and provide regular training regarding their use.

Findings

1. Board Policy and Administrative Regulation 3514.1 were last adopted in May 1997 but are current based on the California School Boards Association's GAMUT information service.

2. All of the district's MSDS's were reviewed and updated during the summer of 2012. Binders containing MSDS's for each product on site are kept in each custodial supply storage location.

3. In July 2012 American Supply Company provided training on the use of chemicals and the MSDS.

4. The lead custodian has been given the task of keeping the MSDS records current and ensuring that only authorized products are on site.

5. FCMAT found the district and site supply storage facilities clean and organized. The MSDS binders were complete, organized and readily accessible.

Recommendations for Recovery

The district should:

1. Continue to routinely audit materials storage areas and MSDS binders to ensure that they are secure, maintained and organized.

2. Continue to ensure that staff training regarding proper handling of materials takes place regularly and whenever a new product is introduced or a new employee is hired.

3. Continue to ensure that employees are trained and understand the importance of safe handling, storage and disposal of materials and supplies.

4. Continue to ensure that employees are trained and understand how to handle both unknown and known hazardous materials.
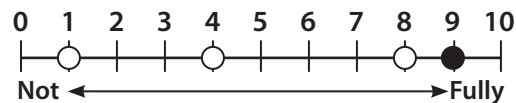
Standard Fully Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 8

March 2013 Rating: 9

Implementation Scale:

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      0   1   2   3   4   5   6   7   8   9  10
      |---O---|---|---O---|---|---|---O---●---|
      Not ◄————————————————————► Fully
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1.16   School Safety

Professional Standard
The LEA has a documented process for issuing and retrieving master and sub-master keys. All administrators follow a standard organization-wide process for issuing keys to and retrieving keys from employees.

Sources and Documentation
1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with school principals

4. Interview with the MOTF technician

5. Key control logs

6. Key authorization forms

Summary of Third Comprehensive Review, March 2012
The district had implemented a strict key control procedure and updated its board policy in this area; however, there were still members of the district staff who did not adhere to guidelines in accordance with the procedure.

Summary of Fourth Comprehensive Review, March 2013
The district is adequately maintaining the key control procedure it implemented. There is still some difficulty retrieving keys from staff members.

Findings
1. The key issuance maintenance log is being maintained.

2. The director of MOTF is overseeing the district key issuance policy and procedures while the site administrators are maintaining key control at school sites. There is still some difficulty retrieving keys from coaches following the end of their seasons.

Recommendations for Recovery
The district should:

1. Continue to communicate board policy, administrative regulations and key issuance procedures to all administrators, staff and coaches.

2. Continue to aidentify, uthorize and support a specific administrator to oversee and strictly enforce district key issuance policies and procedures. This person should have the authority to question and restrict key issuances and the responsibility to report to the state administrator any lack of adherence to the procedure.
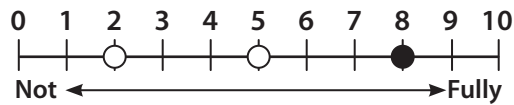
Standard Fully Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 5

March 2012 Rating: 8

March 2013 Rating: 8

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

1.18　School Safety

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.

Sources and Documentation

1. Board policies and administrative regulations

2. Interview with the state administrator

3. Interviews with the school principals

4. Facilities Inspection Tool forms

5. Site visits

Summary of Third Comprehensive Review, March 2012

The lighting in certain areas of the King City and Greenfield high school campuses remained insufficient and problematic, as evidenced by the Facilities Inspection Tool (FIT) evaluations, interviews, and FCMAT's observations. The district had worked to address these conditions but they continued to recur.

Summary of Fourth Comprehensive Review, March 2013

The exterior parking lot lighting at Greenfield High School has been repaired. The lighting at both high school campuses has improved significantly and is satisfactory. The district plans to complete additional lighting improvements at King City High School.

Findings

1. The exterior parking lot lighting at Greenfield High School has been repaired and is operating properly.

2. The FIT evaluation conducted by the county office of education in 2012 identified no issues with lighting at Greenfield or King City High Schools.

3. The district is planning on additional improvements to the exterior lighting at King City High School using the remaining funds from its recently completed modernization project.

4. Both school sites had areas where lighting was not working properly either due to burned out lights or timer systems that were not synchronized.

Recommendations for Recovery

The district should:

1. Develop a plan to regularly review, maintain and repair campus lighting.

2. Develop a plan and a process to regularly evaluate lighting structures for sufficiency and identify needed improvements. Any needed lighting improvements should be included in the facilities master plan.

3. Review budget priorities and determine whether budget adjustments can be made to fund some lighting repairs and improvements.

4. Develop and implement a plan to secure areas when lighting fails until lighting repairs and improvements can be made.
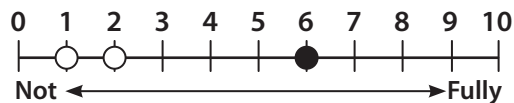
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

Implementation Scale:

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         0   1   2   3   4   5   6   7   8   9   10
         ├───○───○───┼───┼───┼───●───┼───┼───┼───┤
          Not ◄─────────────────────► Fully
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1.20   School Safety

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interviews with the school principals

4. Interview with the human resources administrator

5. Site evacuation plans

6. Employee safety training records

7. Injury and Illness Prevention Plan (IIPP)

8. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district still had not developed a comprehensive district-wide safety plan or a comprehensive plan for training district personnel. The district developed an Illness and Injury Prevention Plan (IIPP) in January 2011; however the plan had not yet been completely implemented.

Summary of Fourth Comprehensive Review, March 2013

The district has not developed a comprehensive districtwide safety plan. The district provides various types of safety training for its employees but has no coordinated or comprehensive plan for employee safety training. There is newly implemented online safety training through the human resources department, and some safety training is provided by outside vendors and consultants.

Findings

1. The district is conducting employee safety training online for electrical and ladder safety. The records of the training are maintained in the human resources department.

2. MSDS safety training was provided by American Supply Company in July 2012.

3. Forklift, fire extinguisher and hazardous chemical safety training was provided to employees by a loss control specialist from the Monterey County Schools Insurance Group Property and Liability JPA.

4. Board Policy and Administrative Regulation 0450, regarding a comprehensive safety plan, were adopted in April 2005 but have not been implemented or updated.

5. Board Policy 0450 calls for each school site council to develop a comprehensive written school safety plan relevant to that school's needs and resources. The policy defines the requirements of the plan including a review and update by March 1 of each year and the requirement for board review and approval. The district is not meeting the requirements of this policy.

6. The district does not have a comprehensive employee safety program.

7. The district does not have a committee to help develop and maintain the comprehensive school safety program.

8. Board Policy 3516, regarding an emergencies and disaster preparedness plan, was updated in January 2011. This policy requires the superintendent to develop and maintain a disaster preparedness plan that details provisions for handling emergencies and disasters and that is included in the district's comprehensive school safety plan. The district's current emergency preparedness plan was last updated in 2007.

9. The district's IIPP has not been fully implemented.

Recommendations for Recovery

The district should:

1. Designate an administrator to be responsible for the formation of a comprehensive employee safety program.

2. Consider establishing a committee to help develop and maintain the comprehensive school safety plan outlined in Board Policy 0450.

3. Provide and coordinate regular safety training and communications to all employees.

4. Integrate elements of the emergency preparedness plan and IIPP into the comprehensive employee safety plan.

5. Establish and administer extensive safety procedures and training for all employees who have potentially hazardous duties.

6. Establish and maintain records documenting safety-related employee communications and trainings.

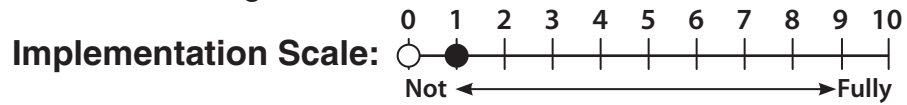7. Schedule comprehensive school safety inspections at least three times per year.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

| 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |

Not ← → Fully

2.2   Facility Planning

Professional Standard

The LEA seeks and obtains waivers from the State Allocation Board for continued use of any nonconforming facilities. (EC 17284-17284.5)

Sources and Documentation

1. Site inspection of King City High School

2. Site inspection of Greenfield High School

3. Interview with the director of MOTF

4. Board Policy 3517

5. Board Policy 7000

6. Interview with the state administrator

Summary of Third Comprehensive Review, March 2012

The district had not yet determined how many nonconforming buildings were in use, nor had they obtained waivers. The district had contracted with an architect to help identify nonconforming buildings and planned to seek a waiver from the State Allocation Board, if required, for all nonconforming buildings.

Summary of Fourth Comprehensive Review, March 2013

The district has made little progress on this standard since the last review. The district still has not inventoried its buildings, identified which buildings are nonconforming, or obtained waivers for their continued use. Previous recommendations have not been implemented.

Findings

1. The district is using nonconforming buildings at King City High School and Greenfield High School for administrative and nonclassroom purposes.

2. The district was unable to produce documentation indicating that the nonconforming buildings have waivers allowing their noncompliance with the Field Act.

3. The district has not pursued waivers from the State Allocation Board for the continued use of its nonconforming buildings.

4. The district has contracted with an architectural firm to identify all nonconforming buildings and determine their status with the State Allocation Board in an effort to obtain any necessary waivers.

5. The district is also using an architect to close out some projects whose files had been closed without certification by the Division of the State Architect (DSA), but this is not the same as identifying nonconforming buildings and obtaining a waiver for their use.

6. The district does not have an administrative regulation regarding the structural safety of school buildings as outlined in Education Code sections 17280-17317.

Recommendations for Recovery

The district should:

1. Complete the review of all buildings to identify those that are nonconforming and/or noncompliant.

2. Apply for waivers from the State Allocation Board for all buildings identified as noncompliant that the district plans to continue using.

3. Develop a plan to replace all nonconforming buildings.

4. Adopt and implement CSBA Administrative Regulation 7111 regarding structural safety in school buildings.
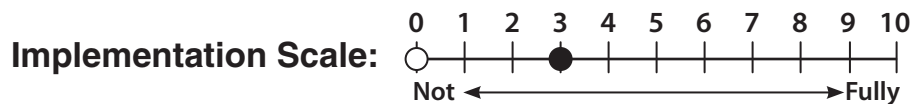
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 3

March 2013 Rating: 3

Implementation Scale:

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      0  1  2  3  4  5  6  7  8  9  10
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      Not ◄───────────────────►Fully
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2.3   Facility Planning

Professional Standard

The LEA has established and uses a selection process to choose licensed architectural/ engineering services. (GC 4525-4526)

Sources and Documentation

1. Board Policy 7140

2. Administrative Regulation 7140

3. Interview with the director of MOTF

Summary of Third Comprehensive Review, March 2012

The district updated its board policy on architectural selection. The state administrator did not follow the competitive bidding process in a recent selection of architectural services; because of the time-sensitive nature of the district's most recent capital improvement project, he did not involve the board where he was not required to do so.

Summary of Fourth Comprehensive Review, March 2013

There have been no new projects requiring the services of an architect since the last review. The district is still using its current architect to close out projects it started previously with that architectural firm.

Findings

1. The district has not started any new facility projects since the last review. The district is using the services of the architect used in their recent modernization project to close out its remaining modernization projects and has not required any additional items that would necessitate seeking new architectural services.

2. The district did not amend its board policy or administrative regulation on the selection process for architectural services to include an expedited process to be used for emergency situations.

Recommendations for Recovery

The district should:

1. Continue to follow its adopted architectural services selection process with future construction projects.

2. Amend its board policy and administrative regulations as needed to identify and provide for an emergency/expedited selection process as needed while maintaining legal compliance.
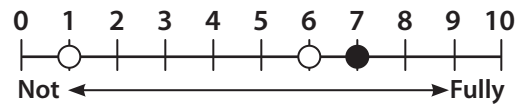
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

2.6   Facility Planning

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.

Sources and Documentation

1. Facilities Master Plan

2. Interview with the director of MOTF

Summary of Third Comprehensive Review, March 2012

TSS Consultants has completed the School Facilities Master Plan.

Summary of Fourth Comprehensive Review, March 2013

There has been no update to the School Facilities Master Plan. The School Facilities Master Plan should be updated to include the completion of the King City High School modernization project.

Findings

1. The district has not updated its School Facilities Master Plan since its completion in February 2011. There are several projects and their associated costs in the master plan that were completed as part of the modernization project at King City High School.

2. Budget amounts in the facilities master plan are not included in the district's budget.

3. The lack of state and local finding has not allowed the district to complete any additional projects.

Recommendations for Recovery

The district should:

1. Review and update its School Facilities Master Plan to reflect the completion of projects identified in the master plan.

2. Regularly review the master plan to ensure its accuracy and to identify and add any necessary new projects and their costs.

3. Include capital planning funds in the district's budget to carry out the facilities master plan.
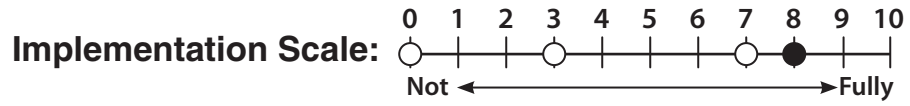
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

Implementation Scale:

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2.8   Facility Planning

Professional Standard

The LEA has a facility planning committee.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with school principals

4. Facility planning committee meeting minutes

Summary of Third Comprehensive Review, March 2012

The district had established a facility advisory committee, which held its first meeting in September 2011.

Summary of Fourth Comprehensive Review, March 2013

The district's facility advisory committee has met four times since the last review. The committee is meeting regularly and is maintaining attendance documentation.

Findings

1. The district's facilities advisory committee met four times since the last review by FCMAT: December 2011, March 2012, June 2012, and September 2012.

2. Because of high turnover of administrative personnel, the district has not formally established a roster of who is on the committee and their position or role.

3. No minutes were created during the meetings.

Recommendations for Recovery

The district should:

1. Continue to ensure that committee meetings are regularly scheduled, well attended and representative of the district's constituents.

2. Seek additional committee members from individuals outside of the district's administration.

3. Prepare minutes to record the activities and recommendations of the committee as well as the district's responses to the committee's questions and recommendations.

4. Consider renaming the committee the School Facilities Planning Committee to more closely comply with the title in this professional standard.
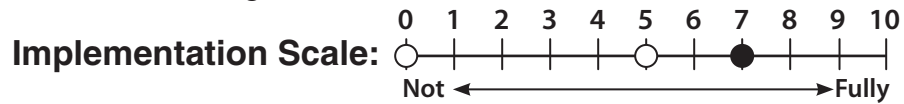
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 5

March 2013 Rating: 7

Implementation Scale:

3.1 Facilities Improvement and Modernization

Legal Standard

The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. District's five-year deferred maintenance plan

Summary of Third Comprehensive Review, March 2012

The district had completed a school facilities master plan but had not updated its five-year deferred maintenance plan since 2009-10. The district was planning to complete a modernization project in the summer of 2012.

Summary of Fourth Comprehensive Review, March 2013

The district has almost completed its modernization project at King City High School and has received approval from the Office of Public School Construction (OPSC) to spend the remaining funds on additional modernization projects at that site. The district still has not updated its five-year deferred maintenance plan since 2009-10.

Findings

1. The district has a five-year deferred maintenance plan that was adopted in fiscal year 2009-10 and that has yet to be fully implemented.

2. The district has no other comprehensive written plan for maintaining or modernizing its school sites.

3. The district has almost completed a modernization project at King City High School and is planning to complete additional modernization projects at that site in 2013.

4. The district has applied for and received an unfunded approval for a grant from the state's Emergency Repair Program.

5. Major maintenance projects are completed as needed depending on their urgency or immediate threat to safety.

6. The general fund budget does not include any planned maintenance projects.

Recommendations for Recovery

The district should:

1. Although it is no longer legally required, update the five-year deferred maintenance plan to re-evaluate and determine current needs in case state funding becomes available for maintenance projects.

2. Develop a comprehensive maintenance plan for all of its facilities for planning and budgeting purposes. The plan should identify both short- and long-term facilities maintenance needs.

3. Include an amount in the maintenance budget each year to complete some of the most urgent projects identified in the maintenance plan.
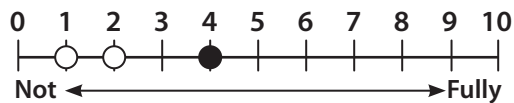
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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3.3   Facilities Improvement and Modernization

Legal Standard

All relocatable buildings in use meet statutory requirements. (EC 17292)

Sources and Documentation

1. Interview with the director of MOTF

2. Board Policy 7000

3. District facility records

4. Architect's report on status of DSA file closeouts

Summary of Third Comprehensive Review, March 2012

The district had hired an architectural firm to help determine if all of its relocatable buildings met statutory requirements.

Summary of Fourth Comprehensive Review, March 2013

The architectural firm the district hired to help assess its relocatable buildings has not completed the project. The Division of the State Architect's (DSA's) records and the district's records for many buildings have been difficult to locate.

Findings

1. The district has relocatable buildings that do not meet statutory requirements and was unable to produce documentation to indicate that its relocatable buildings have met statutory requirements.

2. The district has retained the services of an architectural firm to prepare the documentation necessary to pursue and obtain state approval of any relocatable buildings that do not meet statutory requirements.

3. The architect contracted by the district has begun closing out DSA files which had been closed without DSA certification because of incomplete paperwork.

4. The district has not identified all non-conforming buildings.

Recommendations for Recovery

The district should:

1. Complete the identification and approval process for all of its relocatable buildings.

2. Develop a plan to remove or replace any relocatable buildings that fail to meet statutory requirements and do not receive approval from the state.

3. Develop a comprehensive file of 1-A and 3-A diagrams indicating the relocatable buildings, their date of manufacture, DSA project number, Office of Public School Construction (OPSC) project number, project completion date, and total square footage.
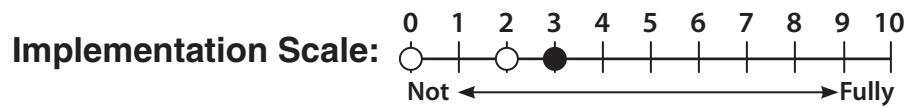
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 3

Implementation Scale:

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       Not ←—————————————————→ Fully
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3.9   Facilities Improvement and Modernization

Professional Standard

The LEA manages and annually reviews its state-approved five-year deferred maintenance plan and verifies that expenditures made during the year are included in the plan.

Sources and Documentation

1. District five-year deferred maintenance plan

2. District facilities and operations budget

3. Interview with the director of MOTF

Summary of Third Comprehensive Review, March 2012

The district was not required to and did not update its five-year deferred maintenance plan; however, expenditures were made from the deferred maintenance fund in the past year in accordance with the existing plan.

Summary of Fourth Comprehensive Review, March 2013

The district did not update its five-year deferred maintenance plan, but it made expenditures from the deferred maintenance fund in the past year in accordance with the existing plan.

Findings

1. The district does not allocate funds to its deferred maintenance fund in accordance with its deferred maintenance plan.

2. The district incurred $4,864 in expenditures from its deferred maintenance fund in fiscal year 2011-12.

3. The director of MOTF maintains an informal list of necessary maintenance projects based on urgency.

4. Under current law, the district is not required to contribute to its deferred maintenance fund or maintain a current five-year deferred maintenance plan.

5. The 2012-13 adopted budget for the deferred maintenance fund indicates a budget of $35,000 in expenditures, no budgeted revenues, and a beginning balance of $2,687, resulting in a budgeted negative ending balance of ($32,313).

Recommendations for Recovery

The district should:

1. Review and update its five-year deferred maintenance plan annually to determine needs and to provide a framework for future planning as funding becomes available.

2. Revise its deferred maintenance fund budget to eliminate the negative ending balance.
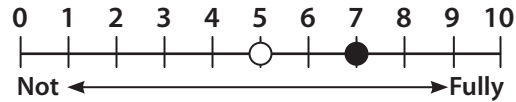
Standard Partially Implemented

February 2010 Initial Rating: 5

March 2011 Rating: 5

March 2012 Rating: 7

March 2013 Rating: 7

Implementation Scale:

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      Not ◄─────────────────► Fully
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3.10 Facilities Improvement and Modernization

Professional Standard

The LEA's staffs are knowledgeable about procedures in the Office of Public School Construction and the Division of the State Architect.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

Summary of Third Comprehensive Review, March 2012

The district had hired additional staff in the MOTF department, and the director's knowledge had improved. The district was working with a new architect, who was coordinating documentation with the district, the DSA, and the OPSC for the current modernization projects.

Summary of Fourth Comprehensive Review, March 2013

The director of the maintenance, operations, transportation, and facilities (MOTF) department has taken further steps to strengthen his knowledge of OPSC and DSA processes.

Findings

1. The director of MOTF traveled to Sacramento twice in the past year to visit the Division of the State Architect and the Office of Public School Construction (OPSC), spending time with their staffs, becoming more familiar with the district's contacts in those offices, and learning more about their procedures and the status of district projects. The director spent one day in each office learning about their requirements.

2. The director of MOTF attended the annual Coalition for Adequate School Housing (CASH) conference in Sacramento to increase his knowledge of current facilities issues and changes in state processes.

3. The district has contracted with an architectural firm to assist with the administration of its modernization projects, which require interaction with DSA and OPSC.

Recommendations for Recovery

The district should:

1. Encourage the director of MOTF to attend informational workshops provided by OPSC and DSA.

2. Encourage the director of MOTF to review the OPSC and DSA handbooks.

3. Encourage the director of MOTF to establish and maintain a network of
    colleagues who have knowledge of OPSC and DSA procedures.

4. Identify other district employees who would benefit from this knowledge, such
    as the chief business official (CBO) or MOTF technician, and have them also attend
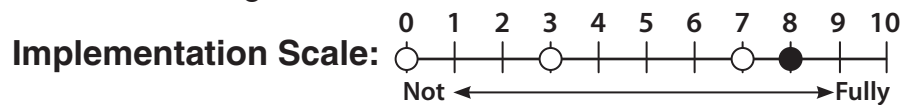   workshops and the annual CASH conference.

Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
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        Not ◄─────────────────► Fully
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4.1 Construction of Projects

Professional Standard

The LEA maintains a staffing structure that is adequate to ensure the effective management of its construction projects.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with the MOTF technician

Summary of Third Comprehensive Review, March 2012

The district had hired additional personnel in the MOTF department to allow the director more time to manage district projects. The district had hired a professional construction management firm for its most recent modernization project.

Summary of Fourth Comprehensive Review, March 2013

The district is planning additional modernization projects at King City High School, which will be managed by a professional construction management firm, with the director of MOTF as the primary liaison for the district. The district has reduced the MOTF technician's hours, which reduced the time the director can be available to manage construction projects.

Findings

1. The district has completed most of its modernization project at King City High School and is planning additional modernization projects at that site. It will continue to use the construction management firm contracted for the initial project.

2. The district has indicated that the director of the MOTF department will function as the decision-making liaison for the district on the new projects.

3. The district has reduced the technician position in the MOTF department to 16 hours per week, which has reduced the amount of time the director is available to manage construction projects.

4. The director of MOTF acted as the primary contact for the district and worked closely with the construction management firm during completion of the modernization project at King City High School, and increased his knowledge of project management considerably in the past year.

Recommendations for Recovery

The district should:

1. Continue to outsource construction management on large projects as needed to ensure proper oversight and expertise.

2. Continue to provide training for the director of MOTF to strengthen his expertise in school construction to help ensure effective management of district construction projects.
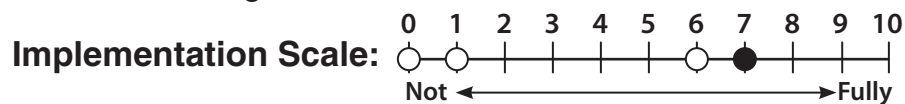
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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        Not ◄─────────────────► Fully
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4.2   Construction of Projects

Professional Standard

The LEA maintains appropriate project records and drawings.

Sources and Documentation

1. Interview with the director of MOTF

2. Interview with the MOTF technician

3. District records and drawings for completed and currently active facilities projects

Summary of Third Comprehensive Review, March 2012

The district had hired additional personnel in the MOTF department, and this resulted in improved organization of district construction records. The district had yet to completely organize all of its records.

Summary of Fourth Comprehensive Review, March 2013

The MOTF technician position has been reduced to two days per week, resulting in a lack of improvement in the organization of the district's construction and maintenance records.

Findings

1. The district has reduced the MOTF technician position's hours to approximately 16 per week, which has resulted in a new backlog in filing and organizing construction and maintenance records.

2. The district is still unable to locate all records relating to all of its building projects. For example, it has not located records identifying each of the DSA numbers for the relocatable buildings on each of the high school campuses.

3. The district has no system for identifying when drawings or other project records are removed from the district facility records filing system, who removed them and when they were returned.

Recommendations for Recovery

The district should:

1. Continue to review and organize all records in its possession.

2. Implement a check-out system for all building plans and other records to ensure that current records are returned and are not misplaced.

3. Require that all contractors and design professionals involved in all construction projects provide the district with a full set of all plans and records pertaining to the project.

4. Consider using temporary clerical assistance for the department to organize and file records in order to remove the current backlog.

5. Require the MOTF director and the technician to develop a detailed and extensive recordkeeping system. These staff members should seek specialized training and assistance from colleagues regarding best practices for records management.
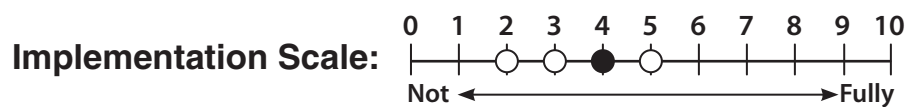
Standard Partially Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 4

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

6.4   Facilities Maintenance and Operations

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.

Sources and Documentation

1. Interview with the director of MOTF

2. Interview with the MOTF technician

3. Interviews with school site principals

4. Custodial and maintenance work schedules

5. Maintenance records

6. Inventory records

7. Purchase orders

8. Site visits

Summary of Third Comprehensive Review, March 2012

The district had made significant improvement in the organization of records, and their supplies were adequate and monitored carefully. The district needed to maintain the improvement they have made and continue to refine the organization of files in the MOTF office and transportation work area. Written standards and procedures for maintenance and groundskeeping needed to be developed.

Summary of Fourth Comprehensive Review, March 2013

The district reduced the hours of the MOTF technician position, resulting in less time to regularly update and maintain records. Equipment and fixed asset inventory records have not been regularly updated to include items purchased and surplused within the past year. The custodial inventory has been monitored and maintained adequately.

Findings

1. The district reduced the MOTF technician position's hours to approximately 16 hours per week. This position is responsible for maintaining files and records for inventory and maintenance.

2. The MOTF technician still monitors orders to ensure that supplies and materials are adequate and accessible while staying within budget.

3. Interviews with the MOTF director and technician indicated that staff have adequate access to the equipment, tools, materials and supplies they need to accomplish their duties, except for specialized equipment that would not be cost effective for the district to own (e.g., a lift to reach parking lot lights, a gas leak detector and other such equipment).

4. Warehouse and storage locations have adequate and appropriate amounts of supplies in stock.

5. Custodial employees were provided with training regarding the cleaning standards.

6. Supervision and evaluation for custodians, groundskeepers, and maintenance staff were given to school site principals in July 2012. Their schedules are now directed by the principals.

7. The district has not developed and implemented standards establishing acceptable levels for maintenance and operations or groundskeeping. To meet the standards the district should create and implement safe and efficient procedures and routines and provide staff with training.

8. The district's equipment inventory and fixed asset inventory have not been updated to include items purchased and surplused since the last commissioned inventory review and do not contain routine maintenance and replacement schedules.

9. The transportation supply storage area was unkempt and disorganized.

Recommendations for Recovery

The district should:

1. Update its equipment inventory regularly as equipment is purchased or surplused.

2. Update its fixed asset inventory regularly as assets are purchased or surplused.

3. Continue inventory controls and adherence to district policies and procedures for purchasing and use of equipment, tools, supplies and materials.

4. Continue to implement cleaning standards and schedules. Include training in safety and procedures as part of the implementation.

5. Develop and implement maintenance and operations standards. Include training in safety and procedures as part of implementation.

6. Develop and implement groundskeeping standards. Include training in safety and procedures as part of implementation.

7. Establish and maintain routine maintenance and replacement schedules for all equipment.

8. Promote communication between employees and management regarding MOTF department needs and improved ways to complete tasks.

9. Encourage the director of MOTF to keep current with the most recent knowledge of industry equipment, tools, materials, methods and processes to help improve the safety, efficiency and effectiveness of the MOTF staff.
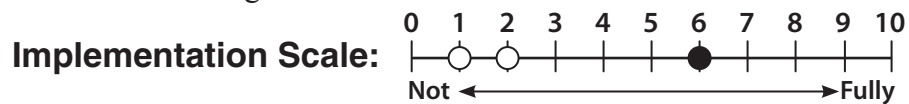
Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 6

Implementation Scale:

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        0  1  2  3  4  5  6  7  8  9  10
        |--O--O--|--|--|--|--●--|--|--|
        Not ←                  →Fully
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6.5   Facilities Maintenance and Operations

Professional Standard

Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with the school site principals

4. Interview with the human resources administrator

5. Evaluation records

6. Job descriptions

7. District organization chart

8. District custodial standards

Summary of Third Comprehensive Review, March 2012

The district had made the supervision of MOTF personnel the responsibility of the school principals. Work standards for maintenance and grounds had not yet been developed. Performance evaluations for all positions in the MOTF department had not been completed.

Summary of Fourth Comprehensive Review, March 2013

Performance evaluations for MOTF department staff have been completed in a timely manner. Custodial standards have been successfully implemented. Work standards for maintenance and grounds positions have not been developed.

Findings

1. Job descriptions for the groundskeepers and maintenance employees do not reflect supervision and evaluation by the site principals.

2. Custodial standards that establish expectations and support accountability have been implemented. The standards include a checklist that is to be completed daily.

3. Work standards have been developed for maintenance and grounds worker positions.

4. Evaluations in the MOTF department were completed in a timely manner.

5. The school site principals work closely with the MOTF director on the evaluations of the MOTF employees at their respective sites.

Recommendations for Recovery

The district should:

1. Develop and implement work standards for maintenance worker positions. Include safety and job procedure training as part of the implementation.

2. Develop and implement standards for groundsworker positions. Include safety and job procedure training as part of the implementation.

3. Ensure that all managers and employees understand the evaluation process including who will be evaluated, who will conduct the evaluation and the timeline for the evaluation.

4. Develop a system to regularly review and update job descriptions to ensure that they meet the district's needs and adhere to best practices.
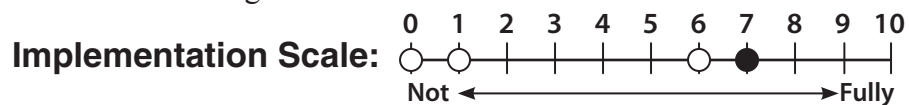
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

0 1 2 3 4 5 6 7 8 9 10

Not ← → Fully

6.6 Facilities Maintenance and Operations

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with the school site principals

4. Job descriptions

5. District custodial standards and schedules

6. Maintenance and grounds worker schedules

Summary of Third Comprehensive Review, March 2012

The job descriptions for maintenance and custodial positions had been revised, and the district had reorganized their supervision and daily responsibilities. The changes had resulted in more staff time at school sites and less time performing tasks in the transportation department.

Summary of Fourth Comprehensive Review, March 2013

The district has placed supervision of custodial, maintenance and grounds workers under the school principals, with input from the director of MOTF. The principals have authority to modify work schedules to fit the needs of their campuses. The district has not developed work standards for the maintenance or groundsworker positions.

Findings

1. The district has developed work standards for maintenance and groundsworker positions.

2. The site principals, working closely with the MOTF director, have the authority to modify the work schedules developed by the MOTF director.

3. Job descriptions for the maintenance and groundsworker positions have not been modified to include supervision by the school principals.

Recommendations for Recovery

The district should:

1. Develop and implement work standards for the maintenance worker positions. Include safety and procedure training in the implementation.

2. Develop and implement work standards for the grounds worker positions. Include safety and procedure training in the implementation.

3. Continue to implement custodial standards, including training and accountability measures.

4. Develop and maintain a process to periodically review and update job descriptions to accommodate changes in procedures, duties and needs.

5. Update the job descriptions for the maintenance and groundsworker positions to include supervision by the school principal.

Standard Partially Implemented

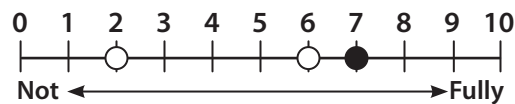February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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6.7　Facilities Maintenance and Operations

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.

Sources and Documentation

1. Board policy

2. Interview with the director of MOTF

3. Work order list

4. Maintenance work schedules

5. Facilities Inspection Tool (FIT) reports, April 2012

6. Site visits

Summary of Third Comprehensive Review, March 2012

The district had not developed a preventive maintenance plan. Maintenance projects were completed based on their urgency or whether they were a threat to student safety.

Summary of Fourth Comprehensive Review, March 2013

The district has not developed a preventive maintenance plan. Maintenance projects are completed based on their urgency or whether they are a threat to student safety

Findings

1. The district does not have a written preventive maintenance plan. An acceptable preventive maintenance plan should anticipate facility maintenance needs and provide resources and schedule facility maintenance work to slow or prevent facility deterioration.

2. The district does not have a written routine maintenance plan. An acceptable routine maintenance plan should identify facilitiy maintenance needs, provide resources and schedule regular and routine activities to maintain facilities and equipment.

3. The district has no schedule for repairing or replacing equipment.

4. The director of MOTF maintains a "to do" list of needed repairs that he delegates to staff as schedules permit.

5. The work order system allows district staff to report and log issues that require maintenance attention.

6. The district has no written plan to address ongoing painting; heating, ventilation and air conditioning (HVAC) maintenance; equipment servicing, except for buses, or other such items. The maintenance worker's schedule includes only tasks from work orders.

7. The district reacts to maintenance needs based on their urgency rather than performing preventive maintenance.

8. The district has assigned supervision and evaluation of the custodial, maintenance, and groundskeeping personnel at the high school sites to the principals.

9. The director of MOTF is no longer responsible for developing work assignments or schedules for personnel at the high school campuses.

Recommendations for Recovery

The district should:

1. Develop maintenance and operations standards and procedures specific to the district's facilities and equipment.

2. Ensure that its inventory of facilities and equipment is current, that it records maintenance and repair activities, and that it identifies recommended maintenance frequencies.

3. Develop a comprehensive and proactive preventive maintenance plan that includes maintenance funding, service intervals, and long-term repairs and replacement and review and update the plan regularly.

4. Establish and implement criteria for evaluating the need for early or delayed replacement of equipment based on age, frequency of repair, cost of repair, cost of replacement, and additional benefit of replacement (e.g., improved efficiency and/or better use to the district).

5. Continue the MOTF director's regular site visits and communications with school administrators to help identify maintenance needs early.
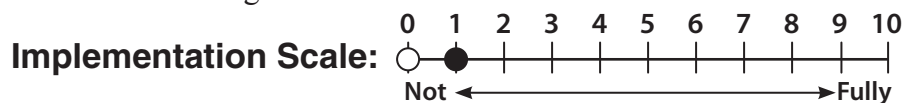
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

Implementation Scale:

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6.8   Facilities Maintenance and Operations

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.

Sources and Documentation

1. Interview with the director of MOTF

2. Interview with the director of technology

3. Interview with the MOTF technician

4. Work order list

5. Facility Inspection Tool

6. Inventory reports

7. Site visits

Summary of Third Comprehensive Review, March 2012

The district had begun developing a process to create and maintain a comprehensive inventory of equipment, vehicles and facilities. The inventory records did not include a plan for replacing any of the equipment.

Summary of Fourth Comprehensive Review, March 2013

The district has developed an inventory of its equipment, vehicles and facilities. The equipment inventory has not been regularly updated in the past year. The district has begun developing a vehicle replacement plan and has removed five vehicles and four buses from service.

Findings

1. The MOTF technician is responsible for the maintenance of an inventory of equipment, but because this position's hours were reduced to approximately 16 hours per week the equipment inventory has not been updated.

2. The inventory does not include a maintenance and replacement schedule.

3. The district's budget does not include adequate funds to meet its facilities' maintenance needs.

4. The district has identified nearly $2 million in repairs that qualify and were approved for the state's emergency repair program in May 2011. However, no state funds are available and the approval remains unfunded.

5. Four buses and five other district vehicles have been removed from service due to their deteriorated condition.

6. The district does not have a vehicle or bus replacement plan.

7. The district has hired another 20-hour-per-week employee to assist with the maintenance and repair of its computers.

8. The inventory of technology equipment is maintained and up to date.

9. The district has a technology equipment replacement policy identified in its technology plan but does not provide funding or equipment replacement as identified. Thus the district lacks a viable plan to update or replace technology equipment.

Recommendations for Recovery

The district should:

1. Update its equipment inventory and complete its facilities inventory.

2. Ensure that its inventory records include maintenance intervals and schedules for all equipment. The records should also include maintenance and service records.

3. Identify funds to maintain and replace equipment at optimal intervals.

4. Regularly update its inventory records to include newly acquired equipment and remove and clear equipment that has been disposed of.

5. Develop and implement a technology plan that includes regular maintenance, updating and replacement of computers.
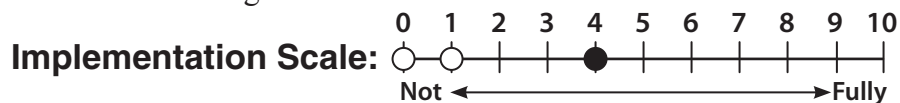
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 4

Implementation Scale:

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7.2   Instructional Program Issues

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)

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Interview with the director of technology

4. Interview with the principal of King City High School

5. Interview with the principal of Greenfield High School

6. School facilities master plan

7. Adopted budget, 2012-13

8. Agendas of the facilities advisory committee

9. School site visits

Summary of Third Comprehensive Review, March 2012

The district had not developed and maintained a plan to ensure the equality and equity of all its school site facilities, and inequities continued to exist. The recently adopted School Facilities Master Plan and the facilities advisory committee both acknowledged the need for equity among all school facilities. The district's budget distributes funding equitably between the two high schools.

Summary of Fourth Comprehensive Review, March 2013

The district has not developed a plan to ensure the equality and equity of all of its school facilities. The district recently completed a large modernization project that has improved the facilities at King City High School. The district is creating a foundation with the goal of raising funds for capital improvements.

Findings

1. The district does not have a formal plan to ensure equality and equity among its school sites.

2. The school sites vary greatly in age, design, structure, location and appearance. These differences lead to different maintenance needs and very different student environments.

3. King City High School recently completed a comprehensive modernization of its gymnasium and locker facilities.

4. The district's application to the state's emergency repair program identifies $1,888,121 in needed repairs for King City High School and only $78,696 for Greenfield High School.

5. The facilities master plan contains a project list for the district that is based in part on "an examination of equity among schools at each grade level."

6. The district has implemented a facilities advisory committee consisting of school district administrators and community members. The committee has met regularly over the past year to discuss facilities issues.

Recommendations for Recovery

The district should:

1. Develop and maintain a plan to ensure the equality and equity of all of its school site facilities

2. Develop facilities standards and ensure that they are considered whenever the district or sites repair facilities or build new facilities.

3. Continue efforts to seek and distribute funding and resources to its schools equitably.

4. Seek input from the facilities advisory committee regarding concerns about potential facilities inequities and how to remedy them.

5. Communicate to the facilities advisory committee, staff, parents, students and the community the district's goal of equity and its efforts to achieve and maintain equity among school sites.
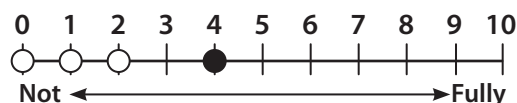
Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

Implementation Scale:

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8.2   Community Use of Facilities

Professional Standard

The LEA has a plan to promote community involvement in schools.

Sources and Documentation

1. Board Policy 1330

2. Interview with the state administrator

3. Interview with the director of MOTF

4. Interview with the school site principals

5. Facilities advisory committee agendas

6. Facilities use requests and forms

Summary of Third Comprehensive Review, March 2012

The district had no written plan to promote community involvement in schools, but it recently formed a facilities advisory committee to improve communication between the district and the community regarding facilities issues.

Summary of Fourth Comprehensive Review, March 2013

The facilities advisory committee has met regularly over the past year. The state administrator is creating a foundation to promote community involvement in the district. The district's facilities are being used frequently by the public, and the condition of the campuses has improved. The district still has no written plan to promote community involvement in the schools.

Findings

1. The district has no plan in place to promote and communicate community involvement in schools.

2. The district has established a facilities advisory committee composed of community members and district personnel.

3. Board Policy 1330, Joint Use Agreements, was adopted in January 2011. This policy promotes the use of public resources and increases access to needed services provided by the district in cooperation with any public agency, public institution and/or community organization.

4. A review of facilities request forms indicates that outside parties are regularly using school facilities. Interviews with the director of MOTF and the site principals

revealed that the frequency of facilities use has sometimes caused scheduling conflicts because of the lack of communication and coordination between the district and sites.

5. The district is working with the city on a plan to allow community use of the track at King City High School after school hours.

6. The state administrator is creating a district foundation to increase community involvement in the development and use of the schools.

Recommendations for Recovery

The district should:

1. Continue to expand the membership of the facilities advisory committee to include more diverse members. Encourage the committee to promote the use of district resources and community involvement.

2. Use the facilities advisory committee to help develop a plan to increase community involvement in the schools.

3. Continue to maintain and improve school facilities and grounds to make them more desirable to use and to decrease liability.

Standard Partially Implemented
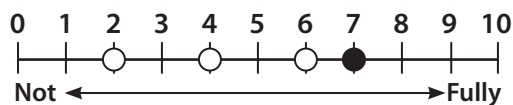
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

Implementation Scale:

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9.1   Communication

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.

Sources and Documentation

1. Interview with the state administrator

2. Interview with the director of MOTF

3. Facilities Inspection Tool (FIT) reports

4. Board of trustees meeting minutes

5. School facilities advisory committee meeting agendas

Summary of Third Comprehensive Review, March 2012

The district had established a facilities advisory committee composed of district and community representatives who were to meet regularly to review and discuss all facilities-related issues. The district continued to communicate with the public regularly through the Facility Inspection Tool mandated by the Williams Act and through annual community forums at which the state administrator discusses facilities.

Summary of Fourth Comprehensive Review, March 2013

The district's facilities advisory committee has met regularly to review district facility needs. The state administrator has begun creating a district foundation to increase community involvement in school facilities improvements and community trust for the organization. The district continues to communicate with the public regularly through the Facility Inspection Tool mandated by the Williams Act.

Findings

1. The district's facilities advisory committee has met four times in the past year. The committee is co-chaired by the director of MOTF and the CBO and is composed of district personnel and community members. The committee has reviewed data and processes, participated in discussions, and made recommendations to the district.

2. The state administrator is creating a district foundation to increase community awareness and involvement in the district's facilities and their needs.

3. The state administrator gives regular presentations to the local Rotary Club to communicate and increase public awareness of the condition of the district's facilities and plans for improvement.

4. The district presents facility inspection reports quarterly at public board meetings.

Recommendations for Recovery

The district should:

1. Continue regular meetings of the facilities advisory committee. Prepare minutes from those meetings to share with the public at regular meetings of the board of trustees.

2. Continue to expand the process for regularly communicating facilities issues or concerns to parents, staff and other community members through methods such as the parent newsletter, the local newspaper or the district's website.

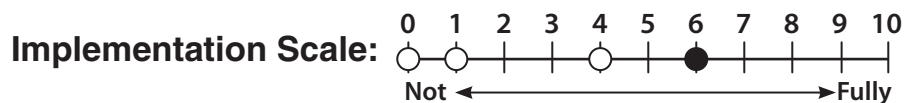3. Consider making a facilities report a regular agenda item at the monthly board of trustees meeting.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 6

Implementation Scale:

13.2   Maintenance and Operations Fiscal Controls

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.

Sources and Documentation

1. Interview with the director of MOTF

2. Interview with the MOTF technician

3. Purchase order records

4. MOTF budget for 2012-13

5. Board policies and administrative regulations

Summary of Third Comprehensive Review, March 2012

The district's business office was requiring completed purchase requisitions. The MOTF technician monitored all purchases for the MOTF department, which had an approval procedure for open purchase orders (POs) and had organized its purchasing files. The district had not updated its board policy related to purchasing.

Summary of Fourth Comprehensive Review, March 2013

The purchasing processes established by the business office are being followed and the system is working well. The MOTF technician is still monitoring the MOTF department's purchasing processes, and the records are well organized. The district has not updated its board policy related to purchasing.

Findings

1. The purchasing process developed by the district's business office requires a completed purchase requisition for all purchases and has been working well during the past year.

2. The MOTF technician continues to monitor all purchasing for the MOTF department, as well as the receipt and distribution of the goods.

3. The district maintains open purchase orders (POs) with several local vendors for routine purchases of frequently used items. Receipts for these purchases are filed in a binder that corresponds to the open PO.

4. The MOTF department's purchasing records remain well organized by vendor and by PO number.

5. The district has not updated its board policy that pertains to purchasing and governs the use of open POs, maximum dollar amounts on open purchase orders, and authorization requirements.

Recommendations for Recovery

The district should:

1. Continue to maintain and refine the purchasing process created by the business office to include an open purchase order process and controls for purchasing items that exceed a specified dollar amount.

2. Support the MOTF staff's fidelity to the purchasing protocols through continued training regarding the purchasing process, appropriate delegation of authority, and district business office oversight.

3. Update the board policy for purchasing to more precisely guide the procurement practice.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 6
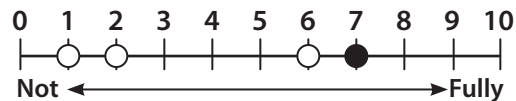
March 2013 Rating: 7

Implementation Scale:

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      Not ←                  → Fully
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Table of
Facilities Management Ratings

Facilities Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 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	4	5	5
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)	4	4	4	4
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)	3	4	5	7
1.9 LEGAL STANDARD – SCHOOL SAFETY The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)	0	3	5	5
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	4	8	9
1.16 PROFESSIONAL STANDARD – SCHOOL SAFETY 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.	2	5	8	8
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.	1	1	2	6
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.	0	1	1	1
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	3	3

Facilities Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
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	6	7
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.	0	3	7	8
2.8 PROFESSIONAL STANDARD – FACILITY PLANNING The LEA has a facility planning committee.	0	0	5	7
3.1 LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)	1	2	4	4
3.3 LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION All relocatable buildings in use meet statutory requirements. (EC 17292)	0	0	2	3
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.	5	5	7	7
3.10 PROFESSIONAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION The LEA's staff are knowledgeable about procedures in the Office of Public School Construction and the Division of the State Architect.	0	3	7	8
4.1 PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS The LEA maintains a staffing structure that is adequate to ensure the effective management of its construction projects.	0	1	6	7
4.2 PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS The LEA maintains appropriate project records and drawings.	2	3	5	4

Facilities Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating
6.4 PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS 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.	1	2	6	6
6.5 PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.	0	1	6	7
6.6 PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS 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	6	7
6.7 PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS 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
6.8 PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS 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	1	4	4
7.2 LEGAL STANDARD – INSTRUCTIONAL PROGRAM ISSUES The LEA has developed and maintains a plan to ensure the equality and equity of all of its school site facilities. (EC 35293)	0	1	2	4
8.2 PROFESSIONAL STANDARD – COMMUNITY USE OF FACILITIES The LEA has a plan to promote community involvement in schools.	2	4	6	7

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 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.	0	1	4	6
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.	1	2	6	7
Collective Average Rating		**1.04**	**2.15**	**4.85**	**5.63**

The collective average ratings for all years are based on the subset of priority standards used in this fourth comprehensive review.