

South Monterey County Joint Union High School District



Comprehensive Review and Recovery Plan

Progress Report

June 2014



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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 current 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 2012-13, the district served 1,971 students, just six fewer than its 2011-12 enrollment of 1,977 students. This is less of a decline in enrollment than in the four previous years.

Ninety-two percent of students in the district are Hispanic or Latino, 5% 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.

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 first 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:

1. 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.
2. 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.
3. 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.
4. 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.
5. The school district has completed all reports required by the Superintendent of Public Instruction and the state administrator.
6. 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.
7. 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 26 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 fieldwork.

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.

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

2. Conduct an External and Independent Assessment

FCMAT used an external and independent assessment process to develop the assessment and recovery plans for the district. This report presents findings and recovery plans based on external and independent assessments conducted by FCMAT staff 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

26 standards in Facilities Management

A narrative regarding progress 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.

June 2014:

Community Relations/Governance: average rating 7.5, with no standards under a 4.

Personnel Management: average rating 7.15, with no standards under a 4.

Pupil Achievement: average rating 5.78, with no standards under a 4.

Financial Management: average rating 4.76, with 7 standards under a 4.

Facilities Management: average rating 8.15, with no standards under a 4.

Table of Summary of Scores

Operational Area	February 2010		March 2011		March 2012		March 2013		June 2014	
	Average Score	Standards under 4								
Community Relations/Governance	0.89	17	2.83	13	5.11	1	6.78	0	7.5	0
Personnel Management	0.92	26	2.69	16	4.27	7	5.88	1	7.15	0
Pupil Achievement	1.38	31	1.87	31	2.87	25	4.50	5	5.78	0
Financial Management	1.54	39	2.93	23	3.39	21	3.54	20	4.76	7
Facilities Management	1.04	25	2.15	20	4.85	6	5.63	4	8.15	0

Study Team

The study team was composed of the following members:

For FCMAT

Anthony L. Bridges, Deputy Executive Officer

Eric D. Smith, Fiscal Intervention Specialist

John Lotze, Technical Writer

For Community Relations and Governance

Eric D. Smith, Fiscal Intervention Specialist

Michele Lawrence, FCMAT Consultant

For Personnel Management

Suzanne Speck, School Services of California, FCMAT Consultant

For Pupil Achievement

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

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

Greig Welch, Assistant Superintendent (Retired), Paso Robles School District; FCMAT Consultant

For Financial Management

Diane Branham, FCMAT Chief Management Analyst

Debi Deal, FCMAT Fiscal Intervention Specialist

Julie Auvil, FCMAT Fiscal Intervention Specialist

For Facilities Management

Anthony L. Bridges, FCMAT Deputy Executive Officer

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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 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.

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 independent study charter school.

The district hired additional district and site administrative staff to rebuild infrastructure and systems to increase accountability. The district has provided increased opportunities for professional development, and has implemented a comprehensive program based on an assessment of student outcomes, though with limited success. The district made progress in facilities management, reorganizing positions and improving the safety and appearance of its sites.

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.

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. There is still a 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 current state administrator has publicly stated that his focus will be on pupil achievement to move the district out of program improvement status.

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 2012 through October 2013.

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 7.5, with no standards not implemented; 7 standards partially implemented, with a rating of one through seven; and 11 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. The March 2013 average scaled score was 6.78, and the June 2014 average scaled score was 7.5, demonstrating continuing improvement over time.

Communications

The first 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 two years ago 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. The working relationship with the South Monterey County Joint Union High School District (SMCJUHS) teachers' association leadership has improved significantly as well. Employee organizations have a recurring time-specific item on the advisory board agenda but seldom use the opportunity to address the state administrator and the school board.

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 and tabulated. 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 indicate that a large majority of the community is satisfied with communication, 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.

There is continued 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.

The budget, facilities, technology and diversity committees are in place, as are district and school site ELAC committees and a curriculum advisory committee. The district hired a new assistant superintendent of administrative services, focused on student achievement. There continues to be an effort to ensure that the various committees' membership reflects the diversity of the district's students and community. The district has established training programs for advisory committees, but the training programs are not fully developed or implemented and are not systematic or sustainable.

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.

Four of the five advisory board members have completed Masters of Governance training from the California School Boards Association (CSBA) and the fifth is receiving the training. The state administrator and advisory board members speak with one voice, and most important matters are properly referred to the state administrator.

The advisory board adopted policies regarding community relations and is regularly involved in advisory board meetings and other community activities. Advisory board members sometimes speak at Rotary club meetings and other community meetings. Advisory board members regularly attend school and community events, and have set an ambitious goal of spending 100 hours each in teachers' classrooms.

Although one member is newly elected, three advisory board members have served more than two terms and one is completing her first term. The state administrator has provided several trainings and special study sessions on numerous topics related to school district governance and policy implementation for all members.

The perception of advisory board members and administrative staff is that the board functions as a team, and disagreements are handled with professionalism and respect. There is clear evidence that advisory board members are prepared for meetings and attend to the important issues of governance.

There has also 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.

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 2013-14 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 76.09%¹ 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. Since that

¹ Source: 2012-13 State-certified data (the last year for which state-certified data is available)

time, the human resources department has made substantial growth each year. The March 2013 average scaled score increased to 5.88, demonstrating that the department was implementing most elements of the standards and that changes were becoming systematic. In March 2014 the average scaled score increased to 7.15, demonstrating continued growth and the ongoing sustainability of the positive changes made over the last five years. For this March 2014 review, no standards were not implemented; 16 standards were partially implemented, with a rating of one through seven; and 10 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 identified metrics it will use in reporting progress to the board based on its achievement of its stated department mission and annual goals. At the time of fieldwork, the department had recently completed its first report. The board report will be produced and shared with the board annually and is a best practice.

Organization and Planning

The level of staffing in the human resources department has been a concern for many years and noted as such in the annual comprehensive reviews. In 2013-14 the district implemented a district office reorganization that adds full-time equivalent (FTE) positions to the human resources department and reassigns duties to the receptionist. This will reduce the human resources administrator's workload and allow the department to continue to make and sustain operational improvements. The district will need to revise job descriptions and update its functional organization chart to reflect any changes as a result of this reorganization.

Employee Recruitment and Selection

Before 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 2013-14 Williams assignment monitoring review found no misassignments, demonstrating that the systems for assignment monitoring are well developed and sustainable.

The human resources department continues to make progress in employee recruitment and selection. The department has continued to ensure that selection procedures are implemented consistently; continued to make substantial improvements in this area by adding pre-employment exams and interview panel briefings to its procedures; and included well-articulated selection procedures in its reference manual. However, recruitment is one of the district's most significant challenges. The district will need to invest more resources in this area and develop an aggressive recruitment plan that identifies key recruitment tasks, personnel responsible for each task, and implementation dates if it hopes to increase the size and quality of future candidate pools.

Evaluation/Due Process Assistance

The district continues to ensure that certificated and classified employees are evaluated according to the criteria set forth in their respective collective bargaining agreements. Evaluations for site and department administrators and for certificated employees continue to be rigorous and are used in making decisions to grant permanent employment status. The human resources

department has created a performance improvement plan template but has not yet fully developed a process for training site and department administrators in its use.

Employer/Employee Relations

The district presented its initial proposals for bargaining with certificated and classified employee groups at a public meeting of the governing board but did not subsequently hold a public hearing as required by Government Code (GC) 3547. Public hearings were held on the classified and certificated employee groups' initial proposals, but prior notice, or sunshining, did not occur. The district negotiated agreements with classified and certificated employee groups that resulted in savings to the district. The board was kept informed of the status of negotiations, and the required AB 1200 disclosures were presented at a public board meeting when the tentative agreements were approved by the state administrator.

The human resources department is annually updating written procedures related to contract management and grievance processing. The procedures are aligned with the certificated and classified collective bargaining agreements and reflect the need for annual training of district administrators. The district made significant progress in 2013-14 in providing site and department supervisors with training in contract management and grievance processing.

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 2014 report is 5.78. Twenty-nine standards were partially implemented, with a rating of one through seven; and three standards are fully implemented, with a rating of eight or nine. Progress is being made on meeting pupil achievement standards, as indicated by the change in mean rating. The pupil achievement report for this fifth comprehensive review emphasizes all of the recommendations from the initial, second, third, and fourth comprehensive reviews and provides some additional detail.

The most notable difference between this annual review and previous reviews is the number of changes that have taken place to address the recommendations included in the previous review. Single Plans for Student Achievement (SPSAs) were completed prior to the start of the school year and included estimated budgets. The SPSAs are also aligned with the updated LEA Plan. School site councils are fully operational at each school site. Steps have been taken to increase opportunities for collaboration between the two school sites in developing common assessments and implementing the Common Core State Standards (CCSS). Continuity has improved with the retention of site and district staff. Instructional coaches are in place at each site.

The following topics recur throughout the pupil achievement findings and recommendations.

Systems

The district continues to make progress in developing various elements of a system, such as those mentioned above, that will provide an instructional program that meets the needs of all of its students. The LEA Plan and SPSAs are updated and funded appropriately, 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 this year as in prior years has been on developing systems, processes, and programs to support student achievement. The district must now bring all of these elements together into one system of plans and guiding documents that have an unrelenting focus on student achievement results.

The district continues in its efforts to find opportunities to work with feeder districts. Successful collaboration and cooperation with feeder districts will significantly affect the district's effort to improve student achievement. Some progress has been made in addressing this issue, and the district is committed to continuing conversations and activities that will lead to a K-12 partnership in the communities served by the high schools.

The district should use the collective knowledge and skills of the teachers, administrators, support staff, students, and parents to fully implement the programs and activities that are included in the district's plans. When challenges arise, those who were included in the process 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. The next step is to focus on results and actively engage in full implementation of the programs and strategies that will accelerate student learning. Most of these strategies and programs are already included in district plans and in this report. 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 primarily long-term in nature and do not address the need to respond early and systematically when students first show signs of failure. Early identification and intervention would provide many students with the opportunity to catch up quickly and get back on track with regular classes. Although the district has implemented a number of instructional options for students who are identified as English learners, this group of students continues to perform significantly below other students in all academic areas. Addressing the learning needs of these students must be a high priority. The district currently has 328 English learners at language levels 1-3 who 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 remain concerned that placement in ELD and SDAIE courses becomes permanent for many of these students and that many of these students 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's graduation rate, A-G completion rate, and the number of students eligible for admission to the California State University and University of California systems demonstrates the urgency for the district to find solutions for all of its underperforming students. The district needs to closely monitor the instruction in intervention classes and ensure that the teachers assigned to those classes are qualified to assist struggling students and English learners. When resources allow, an increase in counseling support should be considered. Administrators, teachers, and students are concerned that there is not enough counseling support available to ensure appropriate placement in, and exit from, intervention classes.

Accountability

The district's teachers and administrators are being evaluated systematically using an agreed-upon process. However, accountability must extend beyond the formal evaluation process. Classroom observations and interviews with teachers and students indicated that the district is far from fully implementing the programs for which it provides professional development and support. In many cases the materials are available but they are not being used in a way that will impact student learning. An example of this is the Edge materials: only two teachers were implementing the program in a way that would benefit English learners. Because professional development and instructional materials are a substantial investment of time, resources and energy, it is important ensure their appropriate use and implementation. For professional development to have a significant effect on student learning, 90% implementation is needed; anything less has little effect on student outcomes. Monitoring also helps identify any additional support and training needed to ensure successful implementation.

The district has made progress in using collaboration time by providing structure and monitoring. Most teachers appreciate that the work done during this time is primarily focused on improving teaching and learning. This time allocation is used differently at each campus. There was some concern that insufficient time is allocated to working together in content areas or departments. An example of this is the implementation of the new math program and the limited time, if any, allocated to planning and implementation.

There is evidence that the work accomplished during collaboration time is having an effect on classroom practice. Interviews and discussions with teachers and administrators continue to be focused on what is happening in the classroom and on practices that increase learning. Common language regarding student achievement and a more collaborative spirit and common understanding among staff members is evident.

Leadership

School principals clearly understand 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 parents and students spoke positively about the school site leadership. They are hopeful that the administrators will stay and continue to provide consistency and stability in school site leadership. District support of school site leadership is essential to the principals' ability to remain focused 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. Developing 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 collaboration time. Teams, committees and work groups can all be effective in solving problems, sharing the workload, and building a collaborative working 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.

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 and geographical location, they all share a commitment to doing whatever it takes to ensure that all of their students learn. It is important to 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.

The fact that few parents and families are actively engaged in their children's education continues to be a concern. The parents and students interviewed for this review shared that many parents do not view themselves as capable of contributing in a meaningful way. IT is worthwhile for school leaders to find ways to help parents and families feel welcome and valued and understand how they affect their child's performance in school. School site leaders on both campuses have increased outreach activities to improve parent involvement and are experiencing increased interest from parents as well as the community.

Financial Management

The financial management section of the comprehensive report assessed the district based on 41 FCMAT standards. The district received an average rating of 4.76, with 39 standards partially implemented and two standards fully implemented. The March 2011 scaled score was 2.93, the March 2012 score was 3.39, and the March 2013 score was 3.54.

The district continues to work to minimize its cash flow deficiencies and its use of the remaining state loan proceeds. Debt service payments on the state loan are included in the district's budget. Using savings from the restructuring of the district's state loan, the district was able to replace 203 computers in classrooms and computer labs at both comprehensive high schools. However, because the loan restructuring is based on the difference between the original interest rate and the most current market rate, and because there is not certainty of absolute savings in any one year, the district should review multiyear commitments for possible savings that can provide recurring revenue to support future technology plans.

Budget and Multiyear Financial Projections

The district has drawn all of the funds from the state loan. Of those funds, \$2,985,000 was placed into the special reserve fund for other than capital outlay projects (Fund 17), and \$1,249,000 was placed in the debt service fund (Fund 56). Monies in Fund 17 were earmarked to pay for state audit findings, which currently total \$1,424,851 (see chart in Standard 10.4); however, during the 2012-13 audit, the auditors moved these funds into the general fund by means of a fund balance transfer. The auditors made no adjustments to the funds held in the debt service fund.

The calculation of the district's reserves in its 2013-14 first interim budget relies on including all the monies held in fund 17. However, by including all of these funds in this calculation, the

district is counting them twice: once for payment of the audit findings and a second time in the calculation of the reserve. A more accurate calculation would subtract the amount needed for the audit findings (\$1,424,851) from the Fund 17 balance (\$2,985,000), leaving \$1,560,149 available to include in the general fund reserve calculation. Applying this formula would reduce the general fund reserves reported in the 2103-14 first interim report from 23.47% to 15.76% for 2013-14, from 23.17% to 15.07% for 2014-15, and from 21.26% to 13.27% for 2015-16. As noted above, the auditors moved the \$2,985,000 from Fund 17 to the general fund. If the district wishes to keep these funds earmarked for payment of the audit findings, the funds should be transferred to a committed fund balance account within the general fund so that they remain separate from the remainder of the reserves and cannot be spent on anything other than the audit findings. The remainder of the general fund reserves should be treated as one-time funds and, as such, used judiciously and only for one-time expenditures.

The district has concluded its collective bargaining with both the certificated and classified employee bargaining units for both 2012-13 and 2013-14. Negotiations have yet to commence for the 2014-15 school year, and neither side has sunshined (that is, made public) their proposals. The collective bargaining agreement with certificated employees expires on June 30, 2014, at which time all provisions of the agreement are subject to revision. The agreement with classified employees expires on June 30, 2016 but allows for reopeners on salary, health and welfare and two other articles for the 2014-15 and 2015-16 school years.

Internal Control Environment

External, independent audit findings continue to identify internal control weaknesses and 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 information.

The business manager is responsible for processing each payroll and for preparing and signing the preliminary payroll list submitted to the Monterey County Office of Education. The county office then produces the payroll warrants and sends them to the district office. The business manager prints the payroll distribution lists and separates the warrants by site. The warrants are then delivered to sites and departments. Staff indicated that employees are required to sign the distribution list to obtain their payroll warrant, and any remaining warrants are brought back to the district office and mailed. The business manager also prepares payroll vendor warrants for mailing to vendors. The business manager is the only district employee who has the training needed to process payroll. Proper internal controls would ensure that the employee responsible for processing payroll is not also responsible for reviewing and signing the preliminary payroll list and does not have access to the warrants received from the county office.

The district needs to develop policies and procedures to enforce internal controls to prevent and/or deter fraud or illegal acts, or misappropriation of funds. To protect the district in this area, policies and procedures should include oversight functions for management as well as internal audits.

Communication and Organizational Capacity

School site and department staff continue to have good working relationships with the business department. The district implemented the Escape financial software system during this review period.

School sites have online access to the district's Escape financial software system and can review account line budgets and print financial reports; however, not all department managers have this access. School site and department staff need additional training in business procedures, budget functions and Escape, and all department managers need to have online access to Escape. Administrators, department managers and staff responsible for budget and purchasing functions also need additional training in these areas. Several staff members are relatively new to their positions and need additional verbal and written training in budget development and monitoring, account coding, and business procedures.

If a budget transfer is needed, site and department personnel call or email the business office to request one. Granting online access to all department managers and implementing an electronic budget transfer form and training staff in its use would improve both efficiency and the internal control environment.

Student Attendance

Both high schools have implemented a previous recommendation to run daily attendance reports, which are used to verify the accuracy of the attendance and then make corrections. The district restructured several positions at the district level, including the truancy specialist position, to provide more direct support at the schools. Previous recommendations to provide cross-training on the California Longitudinal Pupil Achievement Data System (CALPADS) 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 data system analyst. The Aeries student information system has been reconfigured to allow counselors to enter classes into Odysseyware (a classroom credit recovery and advancement software program) for teachers.

Associated Student Body

Each school has one attendance clerk. During this review period, the district restructured district-level truancy and associated student body (ASB) responsibilities to the school sites and combined these functions with attendance reporting. However, both schools experienced a drop of approximately 80% in truancy during the 2011-12 school year between the time of the first and third truancy letters for that year. This was a direct result of training and communication among the school sites, the truancy specialist and parents. The process now involves the school registrars, who produce the first two letters to parents, and school counselors, who make the final notification. However, because these staff members have many other duties and responsibilities, the truancy function is not their highest priority. Truancy letters and any communications with parents or guardians need to be documented in the student record on the Aeries system for future reference. To ensure that the progress made in 2011-12 continues, the district also needs to monitor the effectiveness of the new structure under which school sites are responsible for ASB and truancy functions during the transition year, and make adjustments as needed to ensure consistent, accurate and timely attendance reporting and truancy monitoring.

Management Information Systems

As of July 1, 2013, the Monterey County Office of Education converted all districts in Monterey County to a new financial and human resources software system developed by Escape Technology, Inc. This system integrates payroll, position control, budget, budget development, purchasing and general ledger in one software application. The district has continued working

with the county office to resolve problems, and the county office has provided adequate training and support.

The district's technology department staffing has increased following a district-level restructuring. The current staffing includes the director, a data system analyst, one full-time technician I, and one part-time technology assistant. The technology staff provide central operations to support a wide spectrum of technology services districtwide including the implementation of new software, training, troubleshooting, and updating the districtwide technology plan. The district has a new technology plan for July 1, 2013 to June 30, 2016 that was developed with the input of many stakeholders and that can be found on its website. The technology plan is 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.

Food Services

The district's food services department was restructured concurrent with the hiring of a permanent business manager. The restructure included the elimination of the food and nutritional services manager position. Food service lead positions oversee day-to-day operations at each school site and report directly to the business manager, who oversees all aspects of the food service program.

Breakfast and lunch menus are now posted on each school's website. The district has revised the menu selections to provide nutritious meals and make the menu more appealing to students. A total of 1,291 students districtwide are eligible to receive free or reduced-price meals during the 2013-14 school year. This is a significant increase compared to the prior year data reported by the CDE, which shows a total of 770 eligible students.

The cafeteria fund budget for the 2013-14 fiscal year as of January 31, 2014 shows projected program income of \$489,500 and expenditures totaling \$537,173. Thus the contribution from the unrestricted general fund is expected to be \$47,673, which is a significant drop from \$146,654 for 2012-13 fiscal year.

Facilities Management

The facilities management section of the comprehensive report assessed the district based on 26 FCMAT standards in nine categories. The facilities standards ratings ranged from six to 10 on a scale of zero to 10. The average rating for facilities standards is 8.15, with seven standards partially implemented with a score of one through seven, and 19 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, the March 2012 scaled score was 4.56, and the March 2013 scaled score was 5.63. The ratings for all of the standards improved during this review period. 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

The state administrator and facility staff have maintained the course of facilities improvement established during the previous review. The district's financial position continues to improve, and additional funding has made it possible to plan new maintenance and facilities projects, improve the replacement cycle of equipment, and maintain staffing levels. The district's 2013 first interim financial report includes an allocation of \$350,000 for deferred maintenance projects. Additional lighting projects for Greenfield High School include new lights and ballasts for the library.

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. These programs continue to improve with each consecutive assessment.

School Safety

The district has updated its emergency and disaster preparedness plans, and Board Policy and Administrative Regulation 3514.1 regarding material safety data sheets (MSDS) was adopted in March 2013. The district is providing regular safety training in accordance with its injury and illness prevention plan (IIPP), and regular safety inspection is occurring as recommended in the plan. The district continues to update and maintain its MSDS binders and provide employees with regular online training in their use. Additional safety training is provided by outside vendors and consultants. The first quarterly Williams Facilities Inspection Tool (FIT) report, dated October 2013 by the Monterey County Office of Education, rated both Greenfield High School and King City High School as in good repair, with no items in need of emergency attention.

The district reorganized the supervision of the custodial, maintenance, and groundskeeping personnel during the previous review; some of this supervision is now the responsibility of school principals. The district continues to modify work schedules to meet ongoing needs. The cleanliness of the school campuses has improved considerably since the last review.

The district is maintaining its key control procedures implemented prior to the last review, but there is still some difficulty exercising authority and retrieving keys from staff members.

Facility Planning

The facilities are not overcrowded, and capacity exists for additional students. The district has a long-range facility master plan completed by TSS consultants in February 2011. Changes to the capital planning budget for facilities projects are in process, to include additional funds. The district has applied for and received an unfunded approval for a grant from the state's Emergency Repair Program (ERP). The district anticipates receiving \$1,888,121 in ERP funding for King City High School and \$78,696 for Greenfield High School. These funds are tentative at this time; more information regarding ERP funding will be made available once the state's fiscal year 2014-15 budget has been adopted.

The district's facility advisory committee has met regularly since the last review. The district's architect completed a building inventory and did not identify any nonconforming buildings.

Facility Improvement, Modernization, and Construction

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.

The district completed its modernization project at King City High School and received approval from the Office of Public School Construction (OPSC) to spend the remaining funds on additional modernization projects at that school. Because of amendments in the Budget Act in 2009-10, AB X4, and more recently the Local Control Funding Formula (LCFF), districts are no longer required to submit a five-year deferred maintenance plan and capital budget. However, to continue to make improvements to facilities, the district updated its five-year deferred maintenance plan and allocated \$350,000 for projects in the 2013-14 fiscal year.

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. The district is implementing School Dude maintenance software to monitor, track and record work orders. The software can help the district improve timely responses and determine projects' costs and feasibility. The School Dude work order system will allow district staff to report and log items. School principals indicate that work orders are completed on time and there are no outstanding issues.

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, and continues to update it and remove vehicles from service as part of a vehicle replacement plan. The equipment and asset inventory program should continue to be updated regularly and should include a routine inspection, repair, maintenance and replacement plan.

Community Use

The facilities advisory committee has met regularly over the past year. 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 and has a 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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district's written comprehensive plan for internal and external communication has been implemented. The plan is monitored, and application has become systematic. The advisory 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 state administrator meets with the local newspaper editor following each monthly advisory board meeting and at other times as needed.
3. Updates from the state administrator appeared in the King City Rustler newspaper on September 12, 2013 and September 16, 2013 regarding the state loan and vacancies on the advisory board.
4. A binder of newspaper articles collected over the past year included articles on the recovery plan, advisory board of education update, new advisory board members, student test scores, community forums, students of the month, budget challenges, the hiring of a new assistant superintendent for administrative services, graduation, community donations, honoring volunteers, and many other topics.
5. Board policies 1100 through 1700, regarding communication with the public, were revised and approved in 2010 and remain current.
6. The news media receives advisory board meeting agendas and board packets, and agendas and minutes are posted on the district's website, which has been recently updated.
7. 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.

8. The working relationship with the South Monterey County Joint Union High School District (SMCJUHSD) teachers' association leadership has improved significantly. Employee organizations have a recurring time-specific item on the advisory board agenda but seldom use the opportunity to address the state administrator and the school board.
9. 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.
10. The district distributed a parent satisfaction survey to the community. Survey results are in and tabulated. 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 indicate that a large majority of the community is satisfied with communication, curriculum and school climate.
11. The state administrator is pursuing a goals-related path. The staff are 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 must continuously 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 implementing and monitoring 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 needed. 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. Continue to post advisory board agendas and minutes on its website regularly, and distribute board agendas and packets to news media.
5. 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.

6. Continue to schedule regular meetings with the classified and certificated employee associations' representatives to discuss issues of mutual concern.
7. Continue to distribute the parent satisfaction survey to the community annually.
8. Continue to discuss the results of the parent satisfaction survey in administrative meetings and at school sites. Present the results at a public advisory board meeting and distribute them to the community and the press.
9. 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 Fully Implemented

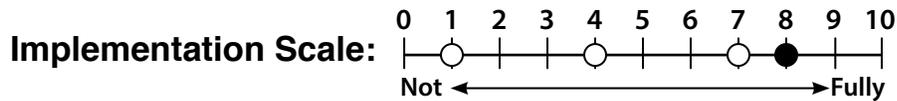
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 7

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

The state administrator had significantly improved communication with staff. Communication was systematic and sustained.

Summary of Fifth Comprehensive Review, June 2014

The state administrator has significantly improved communication with staff. Communication continues to be 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 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.
3. 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.
4. 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.
5. 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 federal categorical funds.
6. 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.
7. The Alert Now telephone message system informs parents when their child is tardy or absent from a class or school.

8. 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 has been 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.
9. The district's curriculum committee meets every other month and deals primarily with federal categorical programs and budgets.

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 advisory board regarding priorities and issues. In addition, continue to hold productive meetings with employee organization representatives.

Standard Fully Implemented

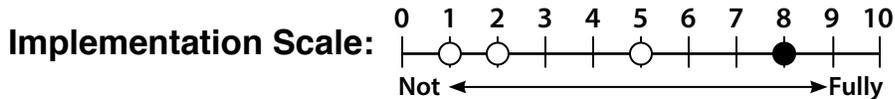
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 8

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

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

Findings

1. Board Policy 1100, adopted November 16, 2011, spells out roles, responsibilities and methods of communication with the public regarding the district's programs and decisions. Board policy 1112, adopted May 11, 2011, establishes the requirement for a media communications plan and the protocols the advisory board must follow when interacting with the media.
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 advisory board member.
5. There is one new advisory board member; he has completed part of the CSBA Masters of Governance training. All other advisory board members have completed the entire training, and the advisory board is committed to having all members receive this training.
6. There has been improvement in staff and advisory board communication and in media coverage. There has been a significant effort to use media coverage of advisory board meetings and school programs more effectively. The state administrator meets with the press following each monthly advisory board meeting. In addition, the state administrator is a Rotary member and speaks at both the Greenfield and King City Rotary meetings.

- 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). The district is striving to improve the timely distribution of information to the media.

Recommendations for Recovery

The district should:

- 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.
- Encourage advisory board members to continue to refrain from speaking publicly about decisions or programs without the knowledge and support of the full advisory board and the state administrator.
- Provide ongoing media relations training for advisory board members and district administrators, including continuing training in the CSBA Masters of Governance program for future board members.
- 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.
- Continue to provide the media with written press releases regularly. Establish frequent contact between the state administrator and the media both between and immediately following advisory board meetings.

Standard Fully Implemented

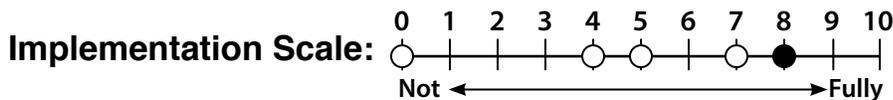
February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

Communication continues to improve. 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. Advisory board members are fully aware of the mission statement.
2. The principals and assistant 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. The Alert Now electronic communication system is used frequently to communicate with parents.
3. Quarterly meetings of ELAC and district site councils are scheduled.
4. Principals hold public forums and school site council meetings to discuss school issues.
5. The state administrator and the principals speak at Rotary club and chamber of commerce meetings.
6. There is media coverage of meetings with parents regarding the status of the district sites.
7. 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.
8. There is some media coverage of school site council and advisory committee meetings.
9. 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 increased average daily attendance, increased opportunity for instruction and increased state funding.

10. 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.
11. The district has a blog online from which staff and community can get current information and to which they can respond immediately.
12. The district's website continues to be 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.
13. School site plans follow district goals.
14. Principals are holding public forums with parents and community members.
15. It is clear that the state 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. Reinforce that the state administrator is the district's spokesperson and is 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 Fully Implemented

February 2010 Initial Rating: 4

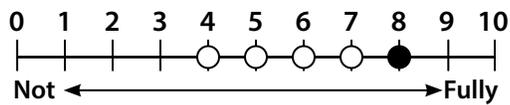
March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



2.8 Parent/Community Relations

Professional Standard

Board members are actively involved in building community relations.

Summary of Fourth Comprehensive Review, March 2013

The board had adopted policies regarding community relations and was regularly involved in board meetings and other community activities. Board members sometimes spoke at Rotary meetings and other community meetings. Board members regularly attended school and community events. The board members had received CSBA training in community relations.

Summary of Fifth Comprehensive Review, June 2014

The advisory board adopted policies regarding community relations and is regularly involved in advisory board meetings and other community activities. Advisory board members sometimes speak at Rotary meetings and other community meetings. Advisory board members regularly attend school and community events, and have set an ambitious goal of spending one hundred hours each in teachers' classrooms. All but one advisory board member has completed the CSBA Masters of Governance training.

Findings

1. Board policies concerning community relations have been updated. Policy updates and revision have become a routine part of advisory board meetings.
2. Because of CSBA training and leadership from the state administrator, advisory board members understand their roles and responsibilities with regard to community relations.
3. Advisory board members attend school functions and visit classrooms. School site administrators appreciate their visibility on campus. Some advisory board members are involved with athletics, FFA and booster clubs, and some speak at Rotary meetings and attend city and community events. Advisory board members have established a highly ambitious goal of spending one hundred hours each in teachers' classrooms.

Visibility of advisory board members at school sites can build credibility and trust between the advisory board and staff and between the advisory board and the community. However, the advisory board's goal of having each member spend at least one hundred hours in teacher's classrooms may be overly optimistic.

4. The state administrator meets with city administrators, the chamber of commerce, the local Rotary club and other civic groups. These activities are beneficial and would be further helped by the advisory board president's participation to increase the advisory board's visibility in community affairs.
5. The advisory board has made a concerted and systematic effort to improve community relations.

6. The district has board policies concerning community relations and now has a formal plan for how advisory board members should be involved in building community relations.
7. All but one advisory board member has completed the Masters of Governance training from the CSBA, and that member is receiving the training.

Recommendations for Recovery

The district should:

1. Continue to ensure that the advisory 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 advisory 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 advisory board president to do the same.
4. Ensure that the advisory board updates its formal communication plan and aligns it with the CSBA's series 1000 policies regarding community relations. The update should include a review of 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 advisory board, in conjunction with the state administrator, develops a formal, written calendar that includes a schedule for each member to attend some school functions so that school events are well attended by advisory board members. Rotate the schedule periodically so that over time every advisory board member attends most of the important school functions, and so that advisory board members visit all classrooms annually. Revisit the goal of each advisory board member spending at least one hundred hours in teachers' classrooms, as this may be overly optimistic.
6. Continue to encourage the advisory 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 Fully Implemented

February 2010 Initial Rating: 1

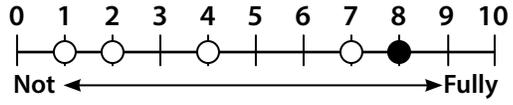
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

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. 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 federal categorical programs for fiscal year 2013-14.
6. School site councils have been formed and meeting dates have been set for the 2013-14 school year.
7. The director of curriculum and assistant superintendent positions have been eliminated. However, an assistant superintendent of administrative services has been hired, with a focus on student achievement.

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.

Standard Partially Implemented

February 2010 Initial Rating: 2

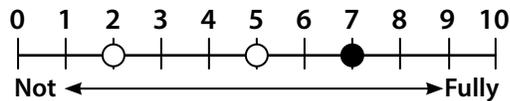
March 2011 Rating: 5

March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 7

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The budget, facilities, technology and diversity district advisory committees are in place, as are district and school site ELAC committees and a curriculum advisory committee. The district hired a new assistant superintendent of administrative services, focused on student achievement. There continues to be an effort to ensure that the various committees' membership reflects the diversity of its students and community.

Findings

1. The district has formed school site councils, and they are functional.
2. The district has established district advisory committees for budget, facilities, technology, diversity, ELAC and curriculum that meet regularly and maintain agendas and meeting minutes. The curriculum advisory committee deals with federal categorical programs and budgets.
3. The district hired a new assistant superintendent of administrative services, with a focus on student achievement.
4. The district continues to make efforts to ensure that the membership of the various committees reflects the diversity of its student population and of the community it serves.
5. More individuals from the community are needed to serve on the various committees.

Recommendations for Recovery

The district should:

1. Continue its use of broad-based committees that reflect its 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 ensure that all committee duties are consistent with meeting and implementing the recommendations and requirements of the recovery plan.
7. Consider a plan to recruit more individuals from the community to participate as members of various committees.

Standard Partially Implemented

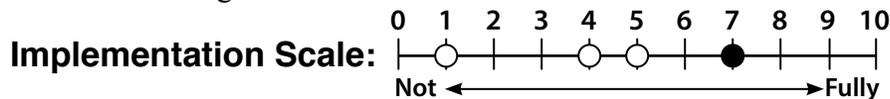
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district continued to establish training programs for advisory committees, but training programs are not 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. District English language advisory committee (DELAC) members receive training, but it is not sustained.
4. The DELAC periodically gives short presentations to the advisory board.

Recommendations for Recovery

The district should:

1. Continue training programs for all advisory committees after members are selected. The training should include information regarding roles and responsibilities, legal requirements, budget overview and other relevant topics.
2. Ensure that DELAC members continue their training regarding their roles and responsibilities as well as the legal requirements of DELAC 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.
6. Continue to have the DELAC committee give short presentations to the advisory board.

Standard Partially Implemented

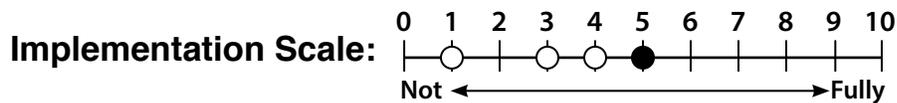
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5



4.5 Policy

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

The board supported and was following its own policies once they were adopted. The board was becoming more involved in policy development and was working well as a team and with the state administrator. There was significant progress on this standard.

Summary of Fifth Comprehensive Review, June 2014

Progress in this standard since the first review has been significant.

Findings

1. The advisory board has been consistent in following its policies once adopted.
2. The advisory board has also been active, with guidance from the state administrator, in developing its own policies, which are kept current through the use of Gamut, the California School Boards Association's (CSBA's) online resource for board policies.

Recommendation for Recovery

The district should:

1. Maintain the same degree of accountability and consistency that now exists with regard to this standard.

Standard Fully Implemented

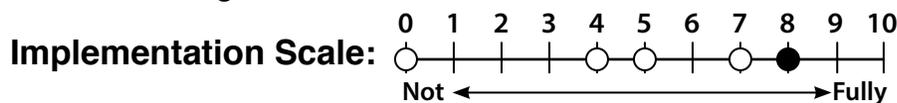
February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8



5.2 Board Roles/Boardsmanship

Professional Standard

Board members receive necessary training to better fulfill their roles.

Summary of Fourth Comprehensive Review, March 2013

Four of the five board members had completed all modules of the CSBA Masters of Governance training; the remaining member had not completed all of the training but was eager to do so. All that remained was to schedule the training for the last member. FCMAT recommended that the training be scheduled as soon as reasonably possible.

Summary of Fifth Comprehensive Review, June 2014

All advisory board members except the newest member will have completed the CSBA Masters of Governance training by March 2014. The state administrator has also provided several trainings and special study sessions on numerous topics. Advisory board members and administrative staff perceive that the board functions as a team and professionally.

Findings

1. All but the new advisory board member, who was seated in December 2013, will have completed CSBA training and received their Masters in Governance certificate by March 2014. The members are also active in the Monterey County School Boards Association and attend annual and quarterly meetings. The new member has made the commitment to also begin CSBA training and has already completed two modules.
2. Although one member is newly elected, three advisory board members have served more than two terms and one is completing her first term. The state administrator has provided several trainings and special study sessions on numerous topics related to school district governance and policy implementation for all members.
3. The perception of advisory board members and administrative staff is that the board functions as a team and disagreements are handled with professionalism and respect. There is clear evidence that advisory board members are prepared for meetings and attend to the important issues of governance.
4. The advisory board clearly understands its role and its relationship with the state administrator, and together they are working in harmony to move the district in a positive direction.

Recommendations for Recovery

The district should:

1. Ensure that the state administrator and advisory board members continue to promote and encourage the training of the newly elected members so that all are fully qualified and an expectation for future members is established.
2. Ensure that all advisory board members continue to avail themselves of the numerous ongoing activities provided by the CSBA, School Services of California, Inc., and other educational institutions for networking and training.
3. Continue to encourage the advisory board members' participation in the Monterey County School Boards Association.

Standard Fully Implemented

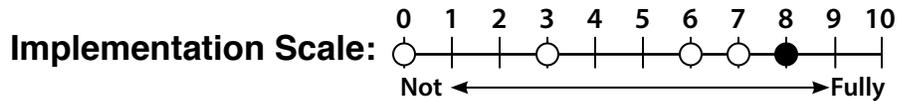
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



5.3 Board Roles/Boardsmanship

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district has been successful in instilling the “Bring on the Pride” theme, which has created a community focus on school pride and academic achievement. The theme is well known in the schools and community. The district’s vision and values have been incorporated into school site plans. However, much work remains to realize the desired student outcomes.

Findings

1. In addition to the formal vision statement and goals, which appear on the district’s website and are posted in various places throughout the district, the advisory board has supported the “Bring on the Pride” theme, which has created a community focus on academic achievement and positive celebration. The theme is well known in the schools and community and appears often in publications, including local press articles.
2. The district’s formally adopted vision and values have been incorporated into school site plans. Several advisory board minutes include adoption of policies in support of academic benchmarks, graduation rates and pupil support services, as well as discussions focused on student achievement.
3. The district’s LEA plan reflects desired social and academic outcomes, and progress is steady in efforts to improve student achievement; however, there is still much to accomplish to realize the desired student outcomes.

Recommendations for Recovery

The district should:

1. Clearly communicate to all constituents the specific targets that will be measured to determine the status and sustainability of the progress the district is making toward regaining local governance.
2. Ensure that each advisory board member is able to articulate and communicate the elements necessary for the district to regain local control and maintain a sustainable school system.

3. To improve its culture and trust, develop measurable indicators other than test scores, such as community and staff surveys, the number of participants attending various activities, and attendance rates, to help it make improvements based on objective data.

Standard Partially Implemented

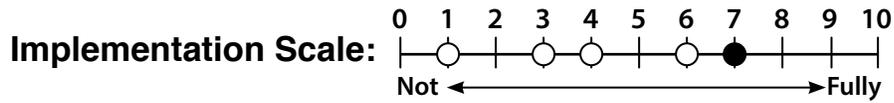
February 2010 Initial Rating: 1

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

Advisory board relationships are harmonious in open and closed sessions. The training sessions board members have received through the CSBA Master's of Governance Program have helped them understand the board's role.

Findings

1. Advisory board relationships are harmonious in open and closed sessions. Resolving differences of opinion or preferences is done respectfully and professionally.
2. The training sessions advisory board members have received have helped them understand the board's role and the importance of their positions in governing the district and affecting student achievement.
3. Advisory board members' support of and reliance on the state administrator to make financial and educational improvements has helped them become better board members. The newest member of the advisory board is respected and was welcomed by the others.

Recommendation for Recovery

The district should:

1. Consider having the advisory board take advisory votes on all agenda items in preparation to assume local control, thus allowing the community to better assess the stability and strength of the board and gain confidence in its ability to resume governance in the future.

Standard Fully Implemented

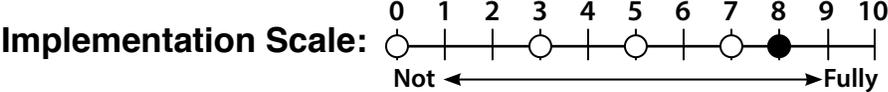
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8



5.6 Board Roles/Boardsmanship

Professional Standard

The board and administrative team maintain functional working relationships.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The state administrator and advisory board members report that protocols have been established for effective communication, and their relationship has become harmonious. The state administrator's visibility in the community and at the school sites has garnered him support. Board members follow the chain of command and refrain from going directly to principals or other staff members with community concerns.

Findings:

1. The relationship between the state administrator and the advisory board has become harmonious and there is a great deal of mutual respect. The state administrator's visibility in the community and at the school sites has garnered him support and improved relationships with the teaching staff and the advisory board.
2. Both the state administrator and the advisory board members report that protocols have been established for effective communication. Formal and informal Friday communications from the state administrator to the advisory board have kept members informed of weekly issues. There is mutual agreement that the advisory board calls upon the state administrator when issues in the community arise and that the state administrator is seldom surprised or caught off guard at meetings.
3. The advisory board members are respectful to the entire administrative team, and any concerns about performance, administrators' practices, or other staff have been taken directly to the state administrator. Advisory board members have refrained from going directly to principals or other staff members with community concerns; rather, they are following the chain of command.

Recommendations for Recovery

The district should:

1. Ensure that the advisory board maintains its current governance practices and positive relationships with the administrative staff, even as new members join the board and staff changes occur.

2. Ensure that the advisory board continues to take concerns to the state administrator rather than principals or other employees.

Standard Fully Implemented

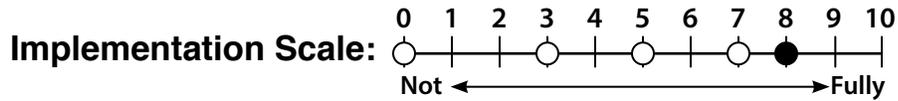
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8



5.9 Board Roles/Boardsmanship

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The state administrator is open and candid with the advisory board regarding confidential information, and the board respects that confidentiality. The advisory board's training from CSBA and School Services of California, Inc. has educated members about the negative consequences of sharing confidential information.

Findings

1. The advisory board members have been consistent in their ethical behaviors related to mutual respect and confidentiality. The state administrator has been open and candid with information of a confidential nature, and the advisory board has respected that confidentiality.
2. Advisory board members expressed appreciation for the CSBA and School Services of California, Inc. training, which has helped them better understand the negative consequences, for them and the district, when confidences are not kept.

Recommendation for Recovery

The district should:

1. Ensure that advisory board members continue attending conferences and inservices that reinforce good governance, so that ethical behaviors and resultant trust become an integral part of the district's governance culture.

Standard Fully Implemented

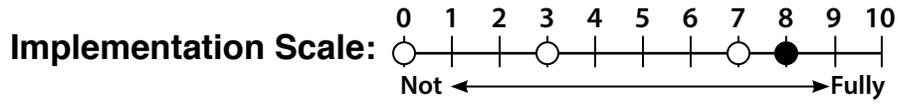
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 8



5.10 Board Roles/Boardsmanship

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

The board, under the guidance of the state administrator, participated in developing and revising policies and in their implementation. The board was supportive of policy decisions once they were made.

Summary of Fifth Comprehensive Review, June 2014

The state administrator uses CSBA's Gamut program to update board policies. All board policies have been updated and are current. The advisory board recognizes that test scores must improve, especially among certain segments of the student population.

Findings

1. Board policies have been updated and are current.
2. There is now a process for using Gamut to bring forward changes in law and regulations that may require the adoption of new policies. Although the advisory board appears to recognize its responsibility to keep policies current, the effort to make policies current has fallen primarily to the state administrators.
3. The advisory board's adoption of the LEA plan has established direction to improve student achievement. All advisory board members recognize that test scores for large segments of their students need to improve, have expressed commitment to continue supporting teacher training and staff development, and see this as an essential ingredient to improve teaching.
4. Through classroom visits, the advisory board has recognized the inconsistencies in classroom teaching and the uneven education some groups of students are receiving. This knowledge will help set future direction.
5. Each advisory board member has expressed a desire to improve the achievement of all students and the board is exploring strategies, such as constructing meaning, which can improve achievement for all students. The advisory board members have made a commitment to spend 100 hours in classroom visits but will need to be more aggressive if they are to meet this goal.
6. The relationship between the advisory board and the state administrator is positive, functional and strong. With the state administrator's guidance the advisory board is

learning how to establish direction and regulations that can improve district functions and student success.

Recommendations for Recovery

The district should:

1. Ensure that the advisory board prepares for eventual restoration of local governance by discussing the characteristics they want in a future leader for the district and the priorities they want to set for that leader.
2. Consider establishing an advisory board subcommittee to review and write future policies for recommendation to the full advisory board for adoption, rather than relying on the state administrator to initiate policy changes.
3. Ensure that advisory board members make the commitment to know the strengths and weaknesses of each of the district's high schools equally. Strive for both a more aggressive and a balanced commitment to visit classrooms and interact with each school's staff.
4. Ensure that advisory board members become more familiar with good instructional practices by attending their own teachers' training session, having more educational presentations at advisory board meetings, reading educational journals and attending workshops on improving pedagogy.

Standard Partially Implemented

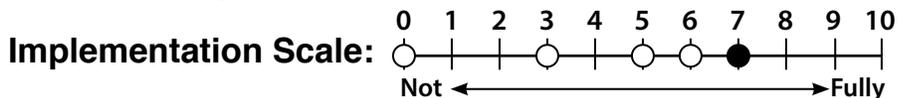
February 2010 Initial Rating: 0

March 2011 rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7



5.11 Board Roles/Boardsmanship

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

Board members visited classrooms, attended school function and events, and participated in community activities. Board meeting agendas always included items related to student programs and student achievement.

Summary of Fifth Comprehensive Review, June 2014

Advisory board members attend school activities and events. Some members are active in local service groups, and some also own businesses in the community, which gives them opportunities to hear their constituents' concerns. The advisory board has discussed and examined test scores yearly, and many board meeting minutes include discussions of student achievement. With new funding anticipated, advisory board members are discussing potential support programs that can better help those students in greatest need.

Findings

1. Living in smaller, tight-knit communities has given the advisory board members the advantage of knowing know the citizens and being able to contribute as advisory board members to the communities' wellbeing. Some members are active in local service groups, and some also own businesses in the community, which gives them opportunities to hear their constituents' concerns.
2. Advisory board members attend school activities and events, and each appears to have made a commitment to maintaining high visibility. The advisory board has applauded the state administrator's commitment to also become involved in the community, and he has gained a great deal of respect in the community for his efforts.
3. Each advisory board member interviewed expressed a deep commitment to eliminating racial prejudice and improving the academic and social well being of all students. Discussion and examination of test scores has occurred yearly at advisory board meetings, and many board meeting minutes include discussions of student achievement. With new funding anticipated, advisory board members are discussing potential support programs that can better help those students in greatest need.
4. The parent group interviewed expressed concern that they knew more about the position of the state administrator than that of the advisory board members. Some also indicated that, given the behaviors of previous board members, lack of trust is still a significant issue.
5. Advisory board members assume that, because advisory board meetings do not see many members of the public complaining, all is well and the community is satisfied. However,

a more objective measure of the extent to which the advisory board’s work reflects the community’s desires could be beneficial.

Recommendations for Recovery

The district should:

1. Develop community assessments, such as surveys, to determine if the advisory board’s work reflects the community’s desires. Survey results can also help the advisory board set future direction and goals.
2. Ensure that advisory board members continue to make every effort to attend student activities and events to continue improving their credibility and knowledge of school activities.
3. Monitor advisory board members’ commitment to visit classrooms, and report visits made at each board meeting.

Standard Partially Implemented

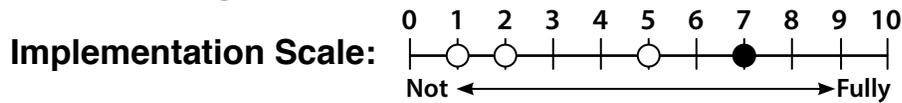
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating 7



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.

Summary of Fourth Comprehensive Review, March 2013

Board members received board packets before board meetings, took their preparation seriously and were ready for board meetings. This preparation was systematic and sustained.

Summary of Fifth Comprehensive Review, June 2014

Advisory board members come to each meeting having read the agenda and prepared to actively participate. They ask relevant questions and make suggestions to improve written policies or agenda items.

Findings

1. Evidence from all sources indicates that all advisory board members come to each meeting having read the agenda and prepared to actively participate. The advisory board asks relevant questions and sometimes makes additions or corrections to written policies or agenda items.
2. Items scheduled for future meetings are often also introduced in the Friday updates from the state administrator, which allows advisory board members to anticipate and be better prepared for advisory board meetings.

Recommendation for Recovery

The district should:

1. Ensure that advisory board members continue to participate in CSBA activities, educational conferences and district study sessions so that they remain current and prepared to fully participate.

Standard Fully Implemented

February 2010 Initial Rating: 2

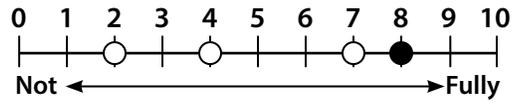
March 2011 Rating: 4

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 8

Implementation Scale:



6.9 Board Meetings

Professional Standard

Board meetings focus on matters related to student achievement.

Summary of Fourth Comprehensive Review, March 2013

Every regular board meeting included information about student programs and student achievement. Principals regularly addressed student programs, test scores and instructional goals. There was considerable improvement in this standard, and implementation was becoming systematic.

Summary of Fifth Comprehensive Review, June 2014

Much of the advisory board's time has been spent dealing with the district's fiscal challenges. However, the board has been actively involved in adopting policies in support of academic benchmarks, graduation rates and pupil support services.

Findings

1. Because of enormous financial challenges facing the district and issues related to collective bargaining, advisory board meetings have been primarily concerned with those issues. However, advisory board meeting minutes include the adoption of policies in support of academic benchmarks, graduation rates and pupil support services. Minutes also reflect some discussions regarding student achievement.
2. The advisory board-approved LEA plan specifies desired social and academic outcomes. There is steady progress in efforts to improve student achievement; however, much remains to be accomplished to realize the desired outcomes.

Recommendations for Recovery

The district should:

1. Ensure that each advisory board meeting includes presentations about the educational aspects of the district, such as progress reports on staff development, common core implementation, and changes in high school curriculum.
2. Make student presentations and recognitions a routine part of advisory board meetings.
3. Strive to make advisory board study sessions more student-centered rather than focused mainly on financial and systems improvements.

Standard Partially Implemented

February 2010 Initial Rating: 1

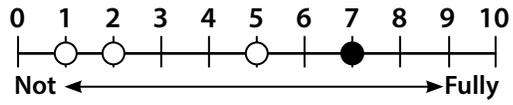
March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 7

Implementation Scale:



Appendix A

Source Documents

1. Newspaper articles
2. LEA Plan
3. Board agenda packets
4. Purchase orders for conference attendance
5. Registration forms for CSBA, Monterey County School Boards Association
6. Copies of certificates of Masters in Governance
7. Copies of parent letters
8. Press releases
9. Weekly updates from the state administrator
10. Registration for Parent Portal account
11. School site council agendas
12. Notification of annual second language assessment
13. Alert Now examples
14. Letter to parents from the state administrator
15. School site plans (Single Plan for Student Achievement)
16. Results of parent satisfaction survey

Appendix B

Positions Interviewed

The FCMAT study team interviewed the following positions to evaluate the standards in the community relations and governance section.

1. State administrator
2. Executive assistant to the state administrator
3. Human resources administrator
4. Business services manager
5. Assistant superintendent of administrative services
6. Principal, Greenfield High School
7. Principal, King City High School
8. CTA chapter president
9. CSEA chapter president
10. Advisory board members (5)

**Table of
Community Relations
and Governance Ratings**

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 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	8
1.2	PROFESSIONAL STANDARD – COMMUNICATIONS Information is communicated to the staff at all levels in an effective and timely manner. Two-way communication between staff and administration regarding the LEA's operations is encouraged.	1	2	5	8	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	8
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	8
2.8	PROFESSIONAL STANDARD – PARENT/COMMUNITY RELATIONS Board members are actively involved in building community relations.	1	2	4	7	8
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	7

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
3.4	<p>PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</p> <p>The board and superintendent have established broad-based committees and councils to advise the LEA on critical issues and operations as appropriate. The membership of these committees and councils reflects the full cultural, ethnic, gender and socioeconomic diversity of the student population.</p>	1	1	4	5	7
3.6	<p>PROFESSIONAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</p> <p>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.</p>	1	1	3	4	5
4.5	<p>PROFESSIONAL STANDARD – POLICY</p> <p>The board supports and follows its own policies once they are adopted.</p>	0	4	5	7	8
5.2	<p>PROFESSIONAL STANDARD – BOARD ROLES/BOARDSMANSHIP</p> <p>Board members receive necessary training to better fulfill their roles.</p>	0	3	6	7	8
5.3	<p>PROFESSIONAL STANDARD – BOARD ROLES/BOARDSMANSHIP</p> <p>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.</p>	1	3	4	6	7
5.5	<p>PROFESSIONAL STANDARD – BOARD ROLES/BOARDSMANSHIP</p> <p>Board members maintain functional working relationships. Individual board members respect the decisions of the board majority and support the board's actions in public.</p>	0	3	5	7	8

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
5.6	PROFESSIONAL STANDARD – BOARD ROLES/BOARDSMANSHIP The board and administrative team maintain functional working relationships.	0	3	5	7	8
5.9	PROFESSIONAL STANDARD – BOARD ROLES/BOARDSMANSHIP Board members respect the confidentiality of information shared by the administration.	0	3	7	8	8
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	7
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	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	8
6.9	PROFESSIONAL STANDARD – BOARD MEETINGS Board meetings focus on matters related to student achievement.	1	2	5	7	7
Collective Average Rating		0.89	2.83	5.11	6.78	7.5

The collective average ratings for all years are based on the subset of priority standards used beginning with the second 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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district's continued commitment to reviewing and revising board policies and administrative regulations, and establishing regular and ongoing communication with employees and the public regarding the board's role in recruiting, hiring, evaluating and disciplining employees demonstrates that this standard is fully implemented and sustainable.

Findings

1. The district's personnel-related board policies and administrative regulations (the 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 communication from the state administrator.
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. The state administrator communicates changes during monthly management meetings to ensure that the management team is aware of these changes.

Recommendations for Recovery

The district should:

1. Continue to review and revise board policies related to personnel functions (the 4000 series). Continue to ensure that adopted policies and administrative regulations form the basis for ongoing review, revision, and refinement of the human resources department's

day-to-day operating procedures and that policies, procedures and practices are in compliance with state and federal employment laws.

2. Ensure that personnel-related policies and procedures adopted by the board are consistently implemented.
3. Ensure that the ongoing review and revision of board policies and administrative regulations 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

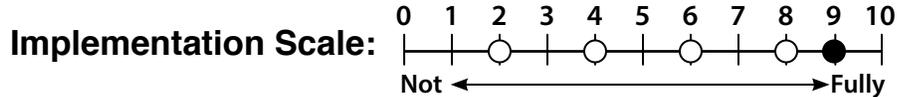
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 8

June 2014 Rating: 9



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The human resources department's vision and mission statement and annual goals and objectives are aligned with the district's vision, mission and goals. The department has identified metrics it will use in reporting progress to the board and has just completed its first report, which will be produced annually.

Findings

1. The human resources department made significant progress in this area in the last year. The department's annual goals 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 department has identified metrics it will use in reporting progress to the board and has just completed its first report, which will be produced annually. At the time of fieldwork, the report had not yet been delivered to the board, but this was planned for March.
3. The report includes, but is not limited to, the following information:
 - The number of vacant positions posted and filled, including the number of applications received, candidates interviewed, and pre-employment exams conducted.
 - The number of teachers and paraeducators hired who met No Child Left Behind (NCLB) requirements.
 - The success of the department's online training program, including the number of employees who completed training in workplace harassment and prevention, child abuse identification and intervention, and other safety-related topics.
 - The challenges confronting the department such as implementation of the "pay or play" provisions of the Affordable Care Act (ACA) and implementation of the new Escape software system for financial and human resources management.
 - Goals for the coming year including, for example, the desire to expand use of the automated absence reporting and tracking system, supporting implementation of the

new employee recognition program, and offering support and training to school site clerical staff in the use of new technologies.

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. Provide the board with an annual report of progress toward meeting department goals and of the services the department provides to employees. In addition to providing data regarding recruitment and selection, completion rates of online training programs, and employee retirements, consider reporting data related to transfers and reassignments, grievances, and substitute services.
3. Continue to implement and monitor department goals and ensure that the annual report is delivered to the board.
4. Add to the human resources annual calendar the development of the annual report and the month in which it will be delivered to the board.

Standard Partially Implemented

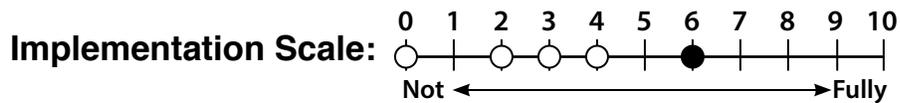
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6



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.

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 was 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 had begun creating a frequently asked questions (FAQ) document for human resource functions in lieu of a functional organizational chart.

Summary of Fifth Comprehensive Review, June 2014

The district implemented a district office reorganization that adds full-time-equivalent (FTE) positions to the human resources department and reassigns duties to the receptionist. This will reduce the human resources administrator's workload. The department has developed a reference manual and posted a frequently asked questions (FAQ) document to the human resources page of the districts website.

Findings

1. The state administrator recently revised the district office's organizational chart and moved some key operational functions from human resources to other departments; this will reduce the human resources administrator's caseload demands.
2. Responsibilities previously assigned to the human resources administrator have been assigned to the human resources assistant/receptionist, including responsibility for tracking and monitoring employee leaves and online training program compliance.
3. The district has created a payroll/benefits specialist position and has assigned to this position health benefit functions that were previously assigned to the human resources administrator.
4. The human resources department has created a new organizational chart that identifies by position the assignment of essential human resources and personnel management functions.
5. The human resources department has created an FAQ document and posted it to the main human resources page of the district's website. The FAQ answers questions about address changes, making changes to payroll deductions, jury duty, what to do if a health insurance card is lost, and other issues. The list of FAQs is short and fits on a single page.

6. The human resources department has developed a department reference manual that includes written procedures and practices related to key human resource functions.

Recommendations for Recovery

The district should:

1. Ensure that the human resources department reference manual is reviewed annually and revised as needed. Add this review to the human resources annual calendar.
2. Add a quick link to the FAQs on the district website's home page. As more FAQs are identified, consider categorizing the questions so that users can click on a particular category rather than scroll through a long list of questions.

Standard Partially Implemented

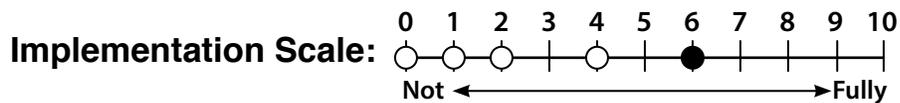
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6



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.

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 was not being filled. The personnel manager was promoted to human resources administrator and continued to participate as a member of the state administrator's cabinet.

Summary of Fifth Comprehensive Review, June 2014

The human resources administrator continues to report directly to the state administrator, is part of the cabinet, and participates in all decisions related to employment of certificated and classified management and nonmanagement employees. The elements of this standard are fully implemented and have been sustained over time.

Findings

1. The district has implemented a district office reorganization that adds FTE positions to the human resources department and reassigns some duties to the receptionist. This will reduce the human resources administrator's workload.
2. The organizational chart has been revised to show the reallocation of human resource functions.
3. The human resources administrator continues to report directly to the state administrator, is part of the cabinet, and participates in all decision-making related to employment of certificated and classified management and nonmanagement employees.
4. The state administrator will continue to be involved in personnel matters including negotiations and employee discipline.

Recommendations for Recovery

The district should:

1. Ensure that the duties of the human resources administrator are clearly defined in a revised job description.
2. Ensure that the human resources administrator continues to participate as a member of the state administrator's cabinet.

Standard Fully Implemented

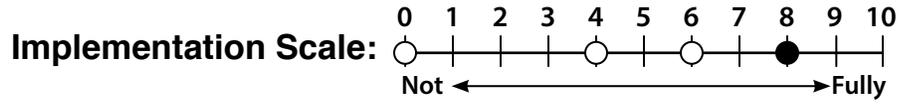
February 2010 Initial Rating: 0

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

The human resources department did not maintain a calendar as indicated in the standard; however, it 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. The human resources administrator and state administrator reviewed CALPADS and CBEDS data prior to its certification and transmission to the state of California.

Summary of Fifth Comprehensive Review, June 2014

The human resources department has an annual calendar that identifies required California Longitudinal Pupil Achievement Data System (CALPADS) and California Basic Educational Data System (CBEDS) submission deadlines and activities. Not all personnel data was successfully moved the new Escape financial system when it was implemented, and some manual entry is still needed. The human resources administrator relied on data in a separate database for CALPADS and CBEDS submissions.

Findings

1. The student information manager has a data management calendar that lists CALPADS and CBEDS submission deadlines and activities and is responsible for coordinating the submission of required reports to the state.
2. The human resources department has developed an annual calendar that indicates required activities and tasks by month, including the department's responsibility for CALPADS and CBEDS.
3. Although implementation of the new Escape financial software is increasing operational efficiencies generally, not all personnel data was successfully moved to the system, and some manual entry is still needed to facilitate future efficiencies related to data retrieval. Because of this, the human resources administrator used a process similar to that used in the past to ensure accuracy of the data.
4. The human resources administrator and the state administrator review CALPADS and CBEDS data before it is certified and transmitted to the state of California.

Recommendations for Recovery

The district should:

1. Invest the time and resources needed to ensure that all employee data is entered successfully into the human resources module of the Escape system.
2. Ensure that the human resources department continues to take responsibility for human resources-related data and functions related to CALPADS and CBEDS.
3. 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.
4. Ensure that the human resources department reviews and revises its annual calendar regularly so that correct adjustments are made.

Standard Partially Implemented

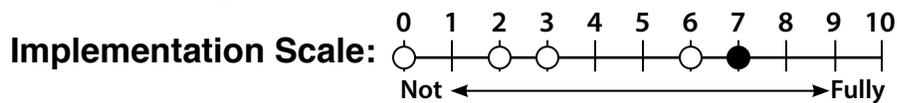
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 7



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)

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

All elements of this standard are fully implemented, and the department has sustained its efforts in this area over the last several years. As a result, the 2013-14 Williams Assignment Monitoring Review found no misassignments, and there was no need to use the limited assignment permit option this year.

Findings

1. The 2013 Williams Assignment Monitoring Review indicated that there were no misassignments. All classes with 20% or more English learner (EL) students were staffed by teachers with the necessary certification.
2. No board resolutions or limited assignment permits were needed in the 2013-14 school year.
3. The human resources department continues to maintain hiring procedures that ensure that authorized positions are based on enrollment projections and the needs of each school as indicated by the master schedule.
4. Hiring procedures continue to ensure that applicants and candidates selected for hire are properly credentialed before positions are offered, including ensuring that they possess authorizations that allow them to instruct EL students.
5. The certificated employee seniority list includes the credentials held by each teacher as well as supplemental and EL authorizations.
6. Recruitment, hiring and assignment procedures have been put in writing, are included in the department's procedures manual, and are reviewed and updated annually.

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 Fully Implemented

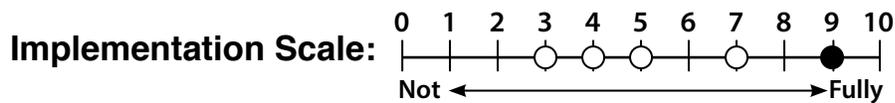
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 9



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.

Summary of Fourth Comprehensive Review, March 2013

The human resources department made progress on this standard and had a written recruitment plan in its department procedures manual, but it was not a comprehensive plan and did 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 were becoming systematic and were driving layoff and hiring decisions.

Summary of Fifth Comprehensive Review, June 2014

The human resources department continues to make progress on this standard. However, recruitment is one of the district's most significant challenges. The district will need to invest more resources in this area and develop an aggressive recruitment plan that identifies key recruitment tasks, personnel responsible for each task, and implementation dates if it hopes to increase the size and quality of future candidate pools.

Findings

1. The human resources department developed enrollment projections for the 2013-14 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 and increasingly involve school site administrators.
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 developing the master schedule and identifying particular kinds of certificated services to be reduced for the subsequent school year.
4. The department continues to make progress in recruitment; however, a comprehensive written plan is still needed to ensure that the district is able to increase the size and the quality of candidate pools. Accomplishing this will require expanding existing advertising and participation in area recruitment fairs. It may also require participating in recruitment

events outside of the immediate area, even statewide. This will require an investment of significantly more resources than have been allocated in the past.

5. 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.
6. 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 to the instructional program and their impact on each school's staffing needs.
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. Develop a recruitment budget that allows it to develop an aggressive recruitment plan that enables the human resources department to increase the size and quality of candidate pools.
4. Continue to review and update written procedures for recruiting management and nonmanagement certificated and classified staff annually.
5. Continue developing relationships with area universities, and continue sending certificated job postings to university placement centers.

Standard Partially Implemented

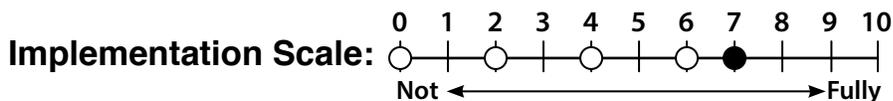
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The human resources department has continued to ensure that selection procedures are implemented consistently. The department has continued to make substantial improvements in this area by adding pre-employment exams and interview panel briefings to its procedures, and it has included well-articulated selection procedures in its reference manual.

Findings

1. With the assistance of CODESP (www.codesp.com), the human resources department has created pre-employment exams for new classified positions. During this reporting period, 40 pre-employment tests were administered as part of the screening and selection process.
2. The human resources department has instituted an interview panel briefing that gives interview chairpersons the opportunity to discuss interview dos, don'ts, and best practices for asking questions and rating candidates. This also allows the chairperson to inform panel members of their legal responsibilities related to nondiscrimination and confidentiality.
3. The human resources department continues to require panel members to sign confidentiality statements before participating in the selection process.
4. The district continues to use standard interview questions for selecting certificated and classified personnel.
5. The department reference manual includes a well-articulated selection and hiring process that identifies the roles of the human resources department, hiring managers, and the state administrator. The procedures manual includes sample reference check forms, interview questions, and rating rubrics.
6. The district consistently used standard background and reference check forms when hiring new certificated and classified employees for the 2012-13 and 2013-14 school years. However, reference checks are not listed as a step in the hiring procedures in the department's reference manual.

- The district continues to maintain recruitment files for all applicants in compliance with legal requirements. These files include applications, pre-employment exams, interview materials, and reference check forms. Recruitment files continue to be correctly classified as temporary in accord with the applicable board policy and administrative regulation.

Recommendations for Recovery

The district should:

- 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.
- Continue to file all reference check forms in recruitment files.
- Retain recruitment records as temporary personnel records, and dispose of records according to the district's records retention policy.
- Update written selection procedures annually and make adjustments as needed. Ensure that the procedures include reference checking.
- Provide all hiring managers with annual training on selection procedures to ensure that they are well equipped to brief interview panels on their legal responsibilities related to nondiscrimination and confidentiality.

Standard Fully Implemented

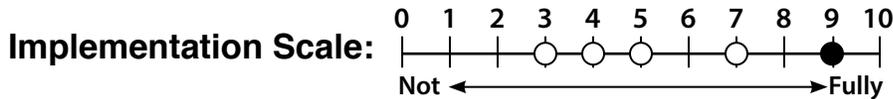
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 9



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued 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 was setting high standards for site leaders.

Summary of Fifth Comprehensive Review, June 2014

Recruiting and selecting strong school leaders continues to be a challenge for the district. The district must invest heavily in an aggressive recruitment plan if it hopes to recruit and select school leaders with a record of success at underperforming schools. The human resources department will need to ensure that job descriptions are updated when vacancies are posted.

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 are sufficient to enable it to recruit and maintain experienced school site administrators.
3. The state administrator has continued to implement a rigorous evaluation process for principals. Evaluation goals 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. Administrative job descriptions reviewed do not contain all of the legally required elements. For example, job descriptions for assistant principals, vice principals, and the coordinator of alternative education did not identify essential job functions. According to the Equal Employment Opportunity Commission (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 as 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.

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 continually updating job descriptions. The human resources department should immediately ensure that all positions advertised include a job description that accurately identifies essential and marginal duties.

Standard Partially Implemented

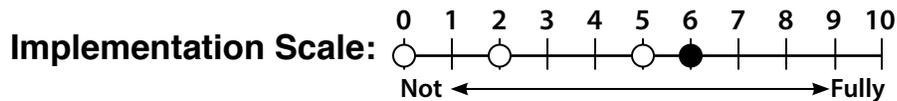
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 6



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)

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The human resources department has expanded the Keenan Safe School online training program for the second year in a row. New training topics include the confidentiality of student records and reasonable suspicion of drug and alcohol use in the workplace. The procedures for providing all employees with the required annual notices are substantially implemented and have been sustained for multiple years.

Findings

1. The human resources department continues 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 human resources department continues to notify employees of assigned trainings electronically, including which training courses are required and their due dates. The department is able to track whether trainings are completed, incomplete, or overdue.
3. The district continues to use Keenan Safe Schools and has, for the second year in a row, expanded mandatory and voluntary trainings. Online training course topics include, but are not limited to, diversity awareness, staff-to-staff sexual harassment, staff-to-student sexual misconduct, nondiscrimination, blood-borne pathogens, child abuse identification and reporting, confidentiality of student records, and reasonable suspicion of drug and alcohol use in the workplace.
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 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.
3. Add to the department reference manual written procedures related to the required annual employee notices.

Standard Fully Implemented

February 2010 Initial Rating: 0

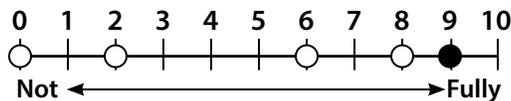
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 8

June 2014 Rating: 9

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to implement a program of new certificated and classified employee orientation, and was using 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 had been revised and the administrative handbook was in development during this review.

Summary of Fifth Comprehensive Review, June 2014

The human resources department continues to implement the elements of this standard consistently and has continued to implement best practices. The department has continued to provide new employee orientation to new employees, including substitute employees. During this reporting period the department completed work on a substitute handbook.

Findings

1. The district continues to implement orientation for new certificated and classified employees, 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. The human resources department has developed a substitute handbook.
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 was developed in 2012-13.

Recommendations for Recovery

The district should:

1. Review and update all employee handbooks annually; add this review to the human resources annual calendar. Ensure that the cover of the handbook indicates the date of the last revision.

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 the district assess the orientation's effectiveness and determine what other information new employees want to learn.
3. Continue to ensure that the hiring process includes completion of the new employee checklist.

Standard Fully Implemented

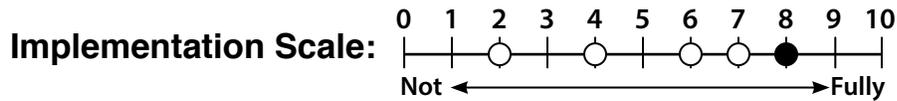
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district continues to reduce vacation and compensatory time off liabilities. This standard is being fully implemented and monitored, but the district has not yet implemented best practices in this area.

Findings

1. The district continues to track employee leave for all groups, including tracking and monitoring classified employees' vacation accruals, overtime and compensatory time.
2. The district continues to reduce vacation liability; the January 23, 2014 leave balance summary report indicates that only three employees have high vacation balances. The district continues to pay off vacation as part of its multiyear plan to eliminate vacation liabilities.
3. The district has not implemented the recommendation that departments develop annual vacation schedules. The district does not require 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, ensure that it is either paid out or that the employee's supervisor schedules 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 collective bargaining agreement with classified staff. 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

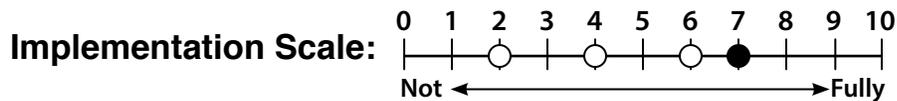
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7



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)

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.

Summary of Fifth Comprehensive Review, June 2014

The district's Program Improvement status did not necessitate demotions or reassignments of management or nonmanagement school staff for the 2013-14 school year. No voluntary transfer requests were filed.

Findings

1. The district's Program Improvement status did not necessitate demotions or reassignments of management or nonmanagement school staff for the 2013-14 school year.
2. No transfers or reassignments were requested or made for the 2013-14 school year.

Recommendation 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

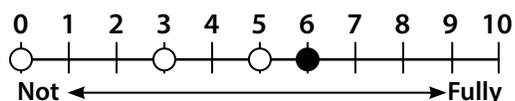
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 6

Implementation Scale:



5.4 Operational Procedures

Legal Standard

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

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

Procedures related to the organization of personnel records are fully implemented and sustainable. However, since the time of FCMAT's last review, payroll records have been added to personnel files, which is not appropriate.

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 2013-14 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.
5. The human resources department has included payroll records in employees' personnel files. Because of all of the potential uses and potential viewers of personnel records, the district must take care to maintain unbiased, factual documentation that protects an employee's privacy rights and rights to confidentiality under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Information in payroll records contains personally identifiable information that should not be kept in the personnel file.

The following documents should not be placed in personnel records but in separate files maintained by the district:

- Medical information
- Payroll information (belongs in a separate payroll file)
- Documents that include an employee's Social Security number or information about an employee's protected classifications such as age, race, gender, national origin, disability, marital status, and religious beliefs.

- Investigation material including the employee complaint, witness interviews, employee interview, findings, attorney recommendations, and resolution, plus follow-up to ensure no retaliation. These items should be kept in an investigation file that is separate from personnel records
- Employee I-9 forms

Recommendations 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.
2. Separate payroll and personnel records to ensure compliance with state and federal laws related to privacy, personally identifiable information, and confidentiality. The payroll and human resources departments should work together to accomplish this.

Standard Partially Implemented

February 2010 Initial Rating: 2

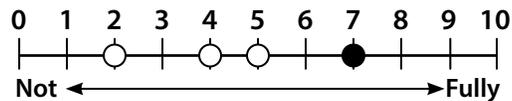
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 7

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The human resources department has continued documenting procedures in the department reference manual. The department has created an organizational chart with essential functions that identifies by position how essential functions are assigned. This chart should also identify functions for which backup personnel have been trained.

Findings

1. The state administrator recently revised the district office's organizational chart and moved some key operational functions from human resources to other departments. This will reduce demands placed on the human resources administrator.
2. Responsibilities previously assigned to the human resources administrator have been reassigned to the human resources assistant/receptionist; these include responsibility for tracking and monitoring employee leaves and online training compliance.
3. The district has created a payroll/benefits specialist position and has moved health benefit functions previously assigned to the human resources administrator to this position.
4. The human resources department has created a new organizational chart that reflects this reorganization and that identifies essential human resource and personnel management functions by position. However, the majority of essential human resource functions continue to be assigned to the human resources administrator.
5. The human resources department's reference manual 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. During this reporting period, the department has added procedures related to ADA, pre-employment tests, beginning teacher support and assessment, new employee orientation, performance evaluations, substitute services, and processing of complaints.

6. The human resources department remains small. This, and the fact that essential procedures are included in the reference manual, makes individual desk manuals less relevant. It also makes it more challenging to identify trained backup personnel to perform essential personnel functions. However, the department needs to identify on the organizational chart functions for which backup personnel have been trained.

Recommendations for Recovery

The district should:

1. Review and revise the human resources department reference manual as needed. Include this review on the human resources annual calendar.
2. Identify backup personnel for essential human resource functions where applicable on the department's organizational chart.

Standard Partially Implemented

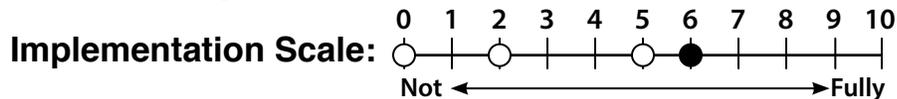
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district has created a payroll/benefits specialist position, but the human resources and payroll departments do not meet regularly to resolve payroll procedures.

Findings

1. The state administrator recently revised the district office's organizational chart, moving some key operational functions from human resources to other departments and creating a payroll/benefits specialist position.
2. The human resources department has created a new organizational chart that reflects this reorganization and identifies essential human resource and personnel management functions by position.
3. The human resources department has not reviewed and revised written procedures for processing personnel requisitions to align them with the reallocation of functions resulting from the creation of the new payroll/benefits specialist position.
4. The human resources and payroll departments do not meet regularly to develop, implement and monitor procedures for resolving payroll errors.

Recommendations for Recovery

The district should:

1. Review and revise written department procedures based on the district office reorganization and the reallocation of essential functions.
2. Ensure that the human resources and payroll departments meet regularly to develop, implement, and monitor well-articulated procedures for resolving payroll errors.

Standard Partially Implemented

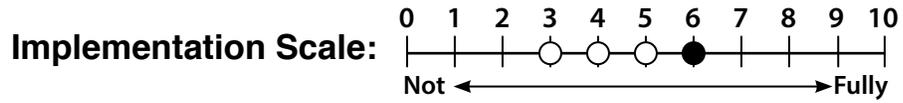
February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6



5.8 Operational Procedures

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district has continued to invest in the human resources administrator's professional development and growth by providing opportunities for local and statewide trainings in best practices and changes that will improve personnel management. The district continues to commit resources to this, demonstrating that this standard is substantially implemented and sustainable.

Findings

1. The human resources administrator attended numerous local and statewide trainings that included, but were not limited to, the following topics:
 - Implementation of the new Escape financial and personnel management system
 - The Affordable Care Act
 - Collective bargaining
 - The Local Control Funding Formula (LCFF)
 - Discrimination and retaliation claims
 - Pension reform
 - Supervision and evaluation
 - Employee leaves
 - Credentials
2. The district has invested significantly in the human resources administrator's training and development during this reporting period. This has enabled the administrator to stay abreast of best practices and changes in laws and regulations affecting public employees.

Recommendations for Recovery

The district should:

1. Continue to invest in the training and development of human resources staff.

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.

Standard Fully Implemented

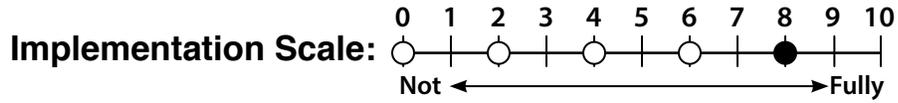
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 8



5.10 Operational Procedures

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

The district continued 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.

Summary of Fifth Comprehensive Review, June 2014

Each year since the 2011-12 school year, the district has reduced overstaffing by ensuring that enrollment and staffing projections were completed early and the business and human resources departments worked collaboratively and engaged school site leaders. However, at the time of FCMAT's fieldwork, the process and timeline had not been developed and there was no direction being given regarding whether staffing reductions might be needed.

Findings

1. As a part of the district office reorganization, the state administrator hired an assistant superintendent of administrative services, who was assigned responsibility for developing a process and timeline for enrollment projections and for developing master schedules. However, at the time of FCMAT's fieldwork the assistant superintendent of administrative services had not yet developed the process and timeline for 2013-14, the human resources department had not been involved in any staffing projections based on projected enrollment or master schedule changes, and there was no indication of whether any reductions in certificated staffing would be needed.
2. Enrollment and course projections are necessary to determine staffing needs for 2014-15, and these projections typically drive decisions regarding reductions in certificated and classified service in advance of statutory layoff timelines. These projections are also needed before deadlines in local collective bargaining agreements for transfers and reassignments and before developing the districts 2014-15 recruitment plan.
3. The district has reduced overstaffing significantly since the 2011-12 school year, and elements of this standard were being fully implemented and had been sustained over multiple years. Continued collaboration between the business and human resource departments, based on a well-articulated process and timeline for enrollment and staffing projections, is essential to that sustainability and continued refinement.
4. The district has not developed classified staffing formulas.

Recommendations for Recovery

The district should:

1. Ensure that a well-articulated process and timeline for staffing projections takes into consideration changes in the instructional program, master schedule changes, and anticipated changes in enrollment. The process and timeline should clearly articulate the roles and responsibilities of human resources, business, curriculum and instructional staff, and school site leaders. The timeline should ensure that necessary reductions in certificated service are identified by the end of January so they can be made by the statutory deadline and so preliminary layoff notices can be issued by March 15.
2. 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.
3. Develop school site and district office staffing formulas for classified employees to ensure consistency between sites.
4. 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

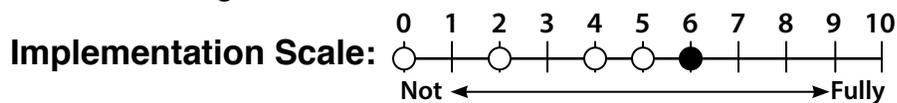
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6



7.1 Use of Technology

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The Escape financial system is fully operational, but not all personnel data was successfully moved to the system, so some manual entry is still needed. The district continues to use personnel requisitions to ensure that it fills only authorized and funded positions.

Findings

1. At the time of FCMAT's fieldwork, the new Escape financial system was fully operational. However, not all personnel data was successfully moved to the system, and some manual entry is still needed to help make data retrieval more efficient (e.g., seniority, class history, credentials).
2. The district continues to consistently use 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, which is being reviewed and updated annually.

Recommendations for Recovery

The district should:

1. Continue to use personnel requisition forms to ensure that only authorized and funded positions are posted and filled.
2. Review and revise procedures for processing personnel requisitions now that the Escape system has been fully implemented, additional staff hired, and essential duties reallocated.
3. Provide additional resources on a short-term basis to ensure that the personnel module of Escape contains all necessary demographic and other personnel-related data. For example, for certificated staff, include information on credentials held and added authorizations. For classified employees, include information such as class history, which

is essential to determining an employee's rights and priority order in case of classified layoffs.

Standard Partially Implemented

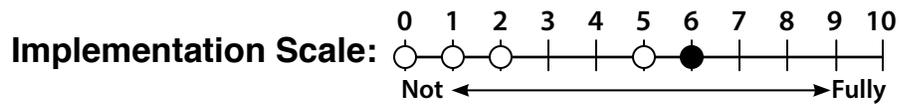
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6



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)

Summary of Fourth Comprehensive Review, March 2013

The district was working with the county office on implementing the new Escape financial software system. The human resources department needed to assess employees' skills and any new skills the new system will require. It was recommended that the district ensure that department staff continue participation in all county office trainings on the new financial system.

Summary of Fifth Comprehensive Review, June 2014

The Escape financial software system has been fully implemented. However, not all personnel data was successfully migrated to the system and some manual entry is still needed. Human resources staff continue to take the training offered by the county office and participate in monthly user group meetings.

Findings

1. At the time of FCMAT's fieldwork, the district had fully implemented the Escape financial software system, which is a fully integrated budget, personnel and payroll system. Escape is improving operational efficiencies, but not all personnel data was successfully moved to the system, and some manual entry is still needed to help make data retrieval and production of personnel reports more efficient.
2. Human resources staff continue to participate in training offered by the Monterey County Office of Education and participate in monthly Escape user group meetings.

Recommendations for Recovery

The district should:

1. Continue to participate in Escape user group meetings and other trainings offered by the county office.
2. Invest the time and resources needed to ensure that all employee data is entered into the human resources module of the Escape system.

Standard Partially Implemented

February 2010 Initial Rating: 1

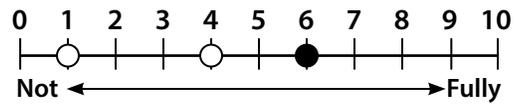
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 4

June 2014 Rating: 6

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to ensure that certificated evaluations were completed as required by the collective bargaining agreement. Although the new certificated employee evaluation system was more rigorous and helped the district decide whether to retain employees, it lacked 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.

Summary of Fifth Comprehensive Review, June 2014

The human resources department continued to ensure that certificated evaluations were completed as required by the collective bargaining agreement. The district is ensuring that classified evaluations are completed as well. The human resources department has created a performance improvement plan template but has not yet fully developed a process for training site and department administrators in its use.

Findings

1. The human resources administrator continues to monitor evaluations of certificated and classified management and nonmanagement staff.
2. The human resources administrator continues to provide administrators with the necessary evaluation forms and communicates evaluation procedures and timelines.
3. Evaluation dates are maintained in a separate employee database. Best practice would be to enter these into Escape.
4. The human resources department is ensuring that certificated and classified staff evaluations are completed as required by the collective bargaining agreements.
5. The state administrator continues to evaluate department directors and schools site principals using a rigorous evaluation tool. School principals are expected to evaluate their assistant principals.
6. The human resources department has created a performance improvement plan template that documents what an 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.

7. The department has not yet fully developed a process for training site and department administrators in the use of the performance improvement plan.

Recommendations for Recovery

The district should:

1. Continue to ensure that supervising managers follow the 2013-14 evaluation schedules provided by the human resources department for certificated and classified employees.
2. Hold supervising managers accountable for completing evaluations in accordance with the provisions of the collective bargaining agreements with certificated and classified employees.
3. Fully develop the performance improvement plan process, and create a written procedure that can be used in training supervisors.
4. Train supervisors in the use of the performance improvement plan template, and hold them accountable for providing struggling employees with meaningful assistance and support.
5. Include the performance improvement plan written procedures in the department's reference manual.

Standard Fully Implemented

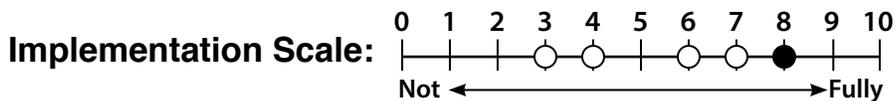
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The district continues to ensure that certificated and classified employees are evaluated according to the criteria set forth in their respective collective bargaining agreements. Evaluations for site and department administrators and for certificated employees continue to be rigorous and are used in making decisions to grant permanent employment status. The human resources department has created a performance improvement plan template but has not yet fully developed a process for training site and department administrators in its use.

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. The human resources department has developed a written procedure for performance evaluations and included this in its reference manual. The procedure identifies the roles and responsibilities of the human resources administrator, the state administrator, and site and department managers.
4. The district continues to provide site and department supervisors with training regarding evaluation criteria, procedures, timelines and forms.

5. The human resources department continues to provide 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 2013-14 schedules provided by the human resources department for evaluating certificated and classified employees.
2. Continue to hold supervising managers accountable for completing evaluations in accordance with the provisions of the collective bargaining agreements with certificated and classified employee groups.
3. Train site and department supervisors in use of the performance improvement plan, and offer support to ensure that the process provides struggling employees with meaningful assistance.

Standard Partially Implemented

February 2010 Initial Rating: 1

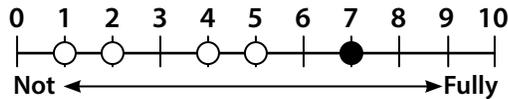
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7

Implementation Scale:



9.2 Employee Services

Professional Standard

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

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 continued to acknowledge employees for service above and beyond the call of duty and recognize them in his monthly blog.

Summary of Fifth Comprehensive Review, June 2014

In addition to recognizing employees for years of service, the state administrator is recognizing employees through the You Make a Difference program. The district is working with employee organizations to expand employee recognition by allowing faculty, staff and students to make nominations.

Findings

1. The district has continued to implement the You Make a Difference employee recognition program in accordance with Board policies 4156.2, 4256.2, and 4356.2. The program recognizes certificated and classified employees who have shown exemplary individual achievement, contribution, and performance in their jobs and other related duties beyond their own area or department.
2. Individuals are nominated by site and department administrators during cabinet and administrative council meetings.
3. Honorees receive a handwritten acknowledgement note signed by the state administrator.
4. The district continues to provide employees with certificates for years of service.
5. The district is working with employee organizations to develop an employee recognition program for which faculty, staff and students can make nominations.

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.

Standard Fully Implemented

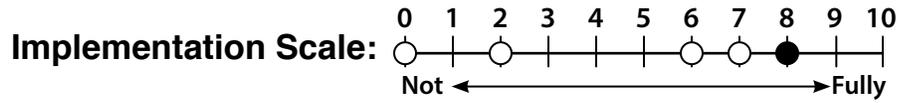
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



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.

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 was expected to use its entire state loan by the end of 2013-14, it was anticipated that the district would need to negotiate concessions with both employee groups.

Summary of Fifth Comprehensive Review, June 2014

The district reached negotiated agreements with certificated and classified employee groups for 2013-14. The district's negotiating team included school site administrators.

Findings

1. Prior to 2009-10, the superintendent and the chief business official represented the district in labor negotiations. During the 2012-13 school year, the state administrator included the business manager, the human resources administrator, and principals in negotiations with certificated and classified employee organizations.
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 continues to discuss negotiation issues with the board in closed sessions, including possible contract changes, the affordability of proposals, and other relevant information.

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. Ensure that school site administrators are represented on the district's negotiating team.

Standard Partially Implemented

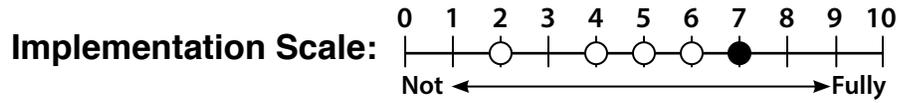
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

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

Summary of Fifth Comprehensive Review, June 2014

The human resources department reviews procedures for contract management and grievance processing annually and updates its procedures manual as needed. The district has made significant progress this year in providing site and department supervisors with training in contract management and grievance processing, ensuring that this standard is fully implemented.

Findings

1. The district's grievance procedure is documented in the collective bargaining agreements with certificated and classified employee groups.
2. The human resources department has developed written procedures for contract management and grievance processing that are aligned with the collective bargaining agreements and has included these procedures in its procedures manual.
3. The district provides site and department supervisors with training in contract management and grievance processing at monthly administrative council meetings.

Recommendations for Recovery

The district should:

1. Continue to provide site and department supervisors with frequent and ongoing training in contract management and grievance processing.
2. Continue to update written contract management and grievance procedures as needed.

Standard Partially Implemented

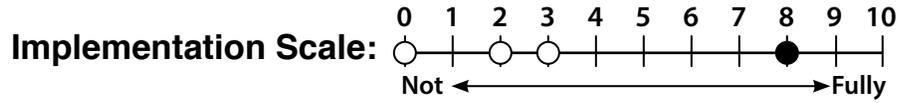
February 2010 Initial Rating: 0

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 8



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, and student outcomes.

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 was expected to use its entire state loan by the end of 2013-14, it was expected that the district would need to negotiate concessions with both employee groups.

Summary of Fifth Comprehensive Review, June 2014

The district presented its initial proposals for bargaining with certificated and classified employee groups at a public meeting of the governing board but did not subsequently hold a public hearing as required by Government Code (GC) 3547. Public hearings were held on the classified and certificated employee groups' initial proposals but prior notice, or sunshining, did not occur. The district negotiated agreements with classified and certificated employee groups that resulted in savings to the district. The board was kept informed of the status of negotiations, and the required AB 1200 disclosures were presented when the tentative agreements were approved by the state administrator at a public meeting of the governing board.

Findings

1. Government Code 3547 requires that the proposals be made public at a meeting of the public school employer and, after a reasonable period of time has elapsed to enable the public to become informed, that a public hearing be held to adopt the initial proposal. The district held a public hearing at the December 19, 2012 meeting of the governing board to adopt the classified and certificated employee groups' initial proposals. The district did not present the initial proposals prior to a public hearing as required by Government Code 3547.
2. The district presented its initial proposals for bargaining at a public meeting of the governing board on April 12, 2012 in accordance with GC 3547. The district did not subsequently hold a public hearing and the governing board did not adopt the initial proposals.
3. The agreement with classified employees resulted in \$46,480 in savings for 2013-14. The state administrator approved the tentative agreement and the required AB 1200 disclosure at a public meeting of the board on September 12, 2013.

4. The agreement with certificated employees resulted in \$143,411 in savings for 2013-14. The state administrator approved the tentative agreement and the required AB 1200 disclosure at a public meeting of the board on May 15, 2013.

Recommendations for Recovery

The district should:

1. Ensure compliance with Government Code 3547 by presenting the initial proposals of the employer and the employee organizations at a public board meeting. At a subsequent meeting of the governing board, a public hearing should be held so that members of the public have an opportunity to comment prior to the adoption of the initial proposals for bargaining.
2. 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:
 - 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.
 - Continually review standards of conduct pertaining to the negotiation process for board members and members of the bargaining team.
 - 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.
 - Continue to provide employee organizations with accurate information regarding the district's financial resources.
 - 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.
 - Keep the public informed about the progress of negotiations and how negotiations may affect the district's goals. Conduct additional analysis of the collective bargaining agreements to analyze areas of significant fiscal impact to the district and those that limit its ability to manage resources effectively. Use the results of the contract analysis to influence and shape future proposals by the district.
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

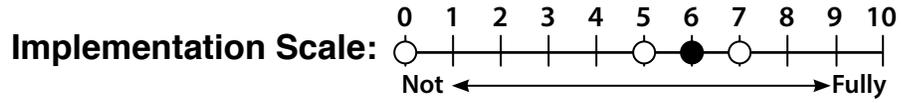
February 2010 Initial Rating: 0

March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 6



Appendix A

Source Documents

Board Policies and Administrative Regulations

Adopted December 12, 2012

1. Board policies 4111, 4211, 4311, Recruitment and Selection
2. Administrative Regulation 4112.6, Personnel Files
3. Board Policy 4112.9, Employee Notifications
4. Exhibit 4112.9, Employee Notifications
5. Board Policy 4119.1, Civil and Legal Rights
6. Board Policy 411.9.21, Professional Standards
7. Board Policy 4121, Temporary Substitute Personnel
8. Administrative Regulation 4121, Temporary Substitute Personnel

Adopted April 10, 2013

9. Board Policy 4030, Nondiscrimination in Employment
10. Administrative Regulation 4161.2, Personal Leave
11. Administrative Regulation 4217.3, Layoff and Reemployment

Adopted September 12, 2013

12. Exhibit 4112.9, 4212.9, 4312.9, Employee Notifications

Adopted January 1, 2014

13. Board Policy and Administrative Regulation 4112.42, Drug and Alcohol Testing for Bus Drivers
14. Administrative Regulation 4161.8, Family Care and Medical Leave
15. Administrative Regulation 4161.1, Industrial Accident and Illness Leave

Documents

16. Update from the state administrator – January 4, 2013
17. Human resources mission, vision, guiding principles document

18. Human resources annual board report
19. Human resources organizational chart with functions
20. Human resources department reference manual
21. Human resources department annual calendar
22. CALPADS calendar for 2013-14
23. General Information regarding CBEDS – CBEDS Dates 2013
24. Assignment monitoring and review report from the Monterey County Office of Education
25. Recruitment plan
26. SmartFind express employee profile
27. Sample job applications for certificated, classified, and substitute employees
28. List of pre-employment exams for library clerks, registrar/ASB clerk, instructional assistants, clerk
29. Interview questions and rating scales for high school assistant principals, coordinator of alternative education, administrative assistant, custodian, bus driver, English teacher, math teacher, groundskeeper, head custodian, and maintenance worker
30. District EdJoin job postings for assistant superintendent of administrative services, assistant principal, principal, and coordinator of alternative education
31. California Association of Latino Superintendents and Administrators' job posting for the district's assistant superintendent of administrative services
32. Human resources reference manual
33. Keenan SafeSchools training course completions from August 5, 2013 through January 29, 2014
34. Administrative evaluation template
35. 2013-14 annual employee notifications
36. New teacher orientation agenda and materials for September 2, 2013
37. New teacher handbook

38. Employee handbook
39. Substitute teacher handbook
40. Certificated collective bargaining agreement
41. Classified collective bargaining agreement
42. Vacation and compensatory time off balance report
43. List of 2012-13 vacation payouts
44. 2012-13 annual leave report
45. Personnel action form
46. Master schedule planning calendar for 2014-15
47. Schedule of monthly Monterey County Office of Education Escape user group meetings for 2013-14
48. State administrator's cabinet meeting notes
49. Notices to site and department managers regarding evaluation lists and timelines
50. Review of evaluations of certificated and classified management and non-management employees
51. List of 2013-14 management negotiations team
52. Certificated sunshine proposal, board agenda for December 19, 2012
53. Classified sunshine proposal, board agenda for April 12, 2012
54. Tentative agreements and memoranda of understanding with certificated and classified employee bargaining groups
55. Board agenda items approving tentative agreements

Workshop and training registration confirmations, agendas, and materials

56. Lozano Smith webinar on the ADA Interactive process, February 16, 2013
57. CSBA – IRS 403(b) plan audit training, April 16, 2013
58. School Services of California, Inc. (SSC) employee benefits workshop, April 30, 2013

59. Monterey County Schools Insurance Group (MCSIG) workshop on the ACA, August 29, 2013
60. Lozano Smith ACA workshop, September 19, 2013
61. Tri-county personnel director meeting agenda for September 26, 2013
62. SSC advanced collective bargaining workshop, October 10, 2013
63. 2013 Monterey County Office of Education calendar year-end payroll workshop
64. 35th annual credential counselors and analysts of California conference, October 16 – 18, 2013
65. Keenan webinar on employment and retaliation claims, November 20, 2013
66. Presentation by the Association of California School Administrators, Total School Solutions and Capitol Advisors on LCFF and negotiations, December 11, 2013

Personnel Files

67. Five randomly selected certificated nonmanagement personnel files
68. Five randomly selected classified nonmanagement personnel files
69. Three randomly selected certificated management personnel files
70. Three randomly selected classified management personnel files

Appendix B

Positions Interviewed

1. State administrator
2. Human resources administrator
3. Business services manager
4. Assistant superintendent of administrative services
5. Director of technology
6. Director of maintenance and operations
7. Members of the management negotiating team
8. School site principals

Table of Personnel Management Ratings

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 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	9
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	6
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	6
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	8
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	7
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	9

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
3.9	<p>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</p> <p>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.</p>	0	2	4	6	7
3.11	<p>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</p> <p>Selection procedures are uniformly applied. The LEA systematically initiates and follows up and performs reference checks on all applicants being considered for employment.</p>	3	4	5	7	9
3.12	<p>PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION</p> <p>The LEA recruits, selects, and monitors principals with strong leadership skills, with a priority on placement of strong leaders at underperforming schools.</p>	0	2	5	6	6
4.3	<p>LEGAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT</p> <p>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)</p>	0	2	6	8	9

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
4.5	<p>PROFESSIONAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT</p> <p>Initial orientation is provided for all new staff, and orientation materials are provided for new employees in all classifications: substitutes, certificated and classified employees.</p>	2	4	6	7	8
5.1	<p>LEGAL STANDARD – OPERATIONAL PROCEDURES</p> <p>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.</p>	2	4	4	6	7
5.3	<p>LEGAL STANDARD – OPERATIONAL PROCEDURES</p> <p>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)</p>	0	3	5	6	6
5.4	<p>LEGAL STANDARD – OPERATIONAL PROCEDURES</p> <p>Personnel files contents are complete and available for inspection. (EC 44031, LC 1198.5)</p>	2	4	5	7	7
5.5	<p>PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES</p> <p>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.</p>	0	0	2	5	6

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
5.7	<p>PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES</p> <p>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.</p>	3	3	4	5	6
5.8	<p>PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES</p> <p>Personnel staff members attend training sessions/workshops to keep abreast of best practices and requirements facing personnel administrators.</p>	0	2	4	6	8
5.10	<p>PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES</p> <p>Established staffing formulas dictate the assignment of personnel to the various sites and programs.</p>	0	2	4	5	6
7.1	<p>PROFESSIONAL STANDARD – USE OF TECHNOLOGY</p> <p>An online position control system is utilized and is integrated with payroll/ financial systems.</p>	0	1	2	5	6
7.2	<p>PROFESSIONAL STANDARD – USE OF TECHNOLOGY</p> <p>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)</p>	1	1	1	4	6

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
8.1	<p>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.</p>	3	4	6	7	8
8.3	<p>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.</p>	1	2	4	5	7
9.2	<p>PROFESSIONAL STANDARD – EMPLOYEE SERVICES The personnel function has developed recognition programs for all employee groups.</p>	0	2	6	7	8
10.2	<p>PROFESSIONAL STANDARD – EMPLOYER/EMPLOYEE RELATIONS The personnel function provides a clearly defined process for bargaining with its employee groups that involves site-level administrators.</p>	2	4	5	6	7

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
10.3	PROFESSIONAL STANDARD – EMPLOYER/EMPLOYEE RELATIONS The personnel function provides all managers and supervisors (certificated and classified) training in contract management with emphasis on the grievance process and administration. The personnel function provides clearly defined forms and procedures in the handling of grievances for its managers and supervisors.	0	2	2	3	8
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	6
Collective Average Rating		0.92	2.69	4.27	5.88	7.15

The collective average ratings for all years are based on the subset of priority standards used beginning with the second 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)

Summary of Fourth Comprehensive Review, March 2013

School site councils had been created and had held initial meetings and trainings for the 2012-13 school year. The goals and priorities of categorical programs did not necessarily align with SPSAs, the LEA plan, WASC accreditation criteria and other school improvement efforts. Budgets had not been finalized at the sites because the district had not yet disseminated fiscal information.

Summary of Fifth Comprehensive Review, June 2014

There is no indication that categorical funding is supplanting services and supplies the district provides. School site councils were in place before school began, and the district provided their members with training and categorical budget information in a timely manner. The goals and priorities of the categorical programs continue to be better aligned with expected learning outcomes and districtwide improvement efforts.

Findings

1. Documents and interviews with staff and site council members do not indicate that categorical funding is supplanting services and supplies provided by the district.
2. Categorical budgets and program decisions have continued to steadily move to the school sites. The sites and site councils have become more informed and in better control of their ability to provide funding for the plans they have developed.
3. Site council members were identified last spring and were actively involved in planning for the implementation of categorical programs for the 2013-2014 school year.
4. The local educational agency (LEA) plan was revised and updated before the start of the school year.
5. The district and school sites are making progress in solidifying a common vision and identifying long-term plans that align with that effort.

Recommendations for Recovery

The district should:

1. Continue to 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 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
 - Meetings
 - Trainings for school site councils
 - 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 single plans for student achievement (SPSAs) and categorical fiscal resources align with and support the LEA plan and Western Association of Schools and Colleges (WASC) accreditation outcomes.

Standard Partially Implemented

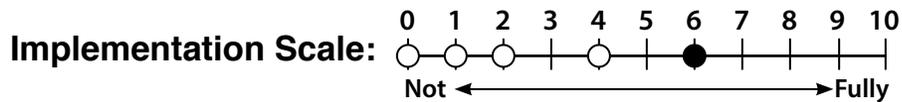
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The district had articulated specific, measurable goals for the 2012-13 school year that addressed improving the achievement of all students and underperforming subgroups, and had distributed those goals to staff and the community.

Summary of Fifth Comprehensive Review, June 2014

The district continues to share its mission and vision statements with the staff and community. Although the vision statement does not address closing the achievement gap, the district has been focusing on improving achievement for all students, including underperforming subgroups.

Findings

1. The LEA Plan, approved on October 9, 2013, includes the following as the vision, mission and state administrator goal for the district:
 - Vision Statement: South Monterey County Joint Union High School District is a progressive academic learning community that is committed to life-long educational success.
 - Mission Statement: South Monterey County Joint Union High School District inspires and empowers all students with the knowledge and skills necessary to achieve their full potential to succeed as responsible and productive citizens.
 - State Administrator Goal: Create and implement a curriculum program that is equitable, accessible and rigorous to all students. Establish relationships with our community of pride!
2. The state administrator continues to share the district's vision and mission statements with staff and the community. The vision statement does not explicitly address closing the district's achievement gaps (e.g., the gap between English-only students and English learners). However, the district and school sites are focused on increasing the rate of reclassification to English proficient and identifying and implementing effective intervention strategies for struggling students. Both comprehensive high schools reported reclassifying more students this academic year compared to the same time last year. Both sites also reported an increase in options for supporting struggling students.

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

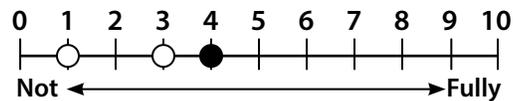
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 3

June 2014 Rating: 4

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Both high schools returned to a seven-period-per-day schedule. The use of weekly collaboration time continued and was increasing teachers' use of effective instructional strategies. High expectations for student achievement were 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.

Summary of Fifth Comprehensive Review, June 2014

Teaching and learning strategies continue to improve throughout the district. Training and sharing teaching methods are becoming more common. The use of student achievement data for long-term planning remains minimal, partially due to a change in data management systems. Administrators and teachers view the addition of two full-time instructional coaches as a positive step.

Findings

1. Administrators and teachers continue to work to improve student achievement.
2. The district is in its second full year of weekly collaboration days. The expectations, planning, and outcomes for these days differ widely at the two high schools. High expectations for student achievement are still not reflected in instructional strategies and academic outcomes.
3. The increase in analysis of student achievement data has declined this past year with the installation of a new data management system. Staff are being trained in the new data system, but the training was not completed at the time of FCMAT's review.
4. There is continuity in administrative positions: the same individuals have remained in the state administrator and both high school principal positions for two school years.
5. Procedures for evaluations of administrators have been revised and updated. Forms and measurement objectives are better aligned with instructional expectations and districtwide improvement efforts.
6. The district's curriculum council is becoming more effective and is a productive resource for planning and implementing improvements.
7. King City High School will undergo a WASC Accreditation review this year. Greenfield High School had a WASC review last year.

8. Development of common benchmarks in subject areas continues to increase. Collaboration between the schools and their departments has improved slightly.
9. Classroom observations, walkthroughs and feedback to instructors have improved and continue to become more common.
10. Both high schools have a full-time instructional coach.

Recommendations for Recovery

The district should:

1. Work to improve communication between sites in planning collaboration days and regarding expected outcomes.
2. Ensure that all staff are adequately trained in using the new data management system and are able to retrieve and use current data for effective planning and strategies.
3. 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.
4. Identify and focus on data to establish benchmarks that will help improve student outcomes.
5. 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.
6. Continue efforts to develop a districtwide plan to create and implement common assessments in all subject areas.
7. Provide districtwide professional development in using data to influence and shape instruction.
8. 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

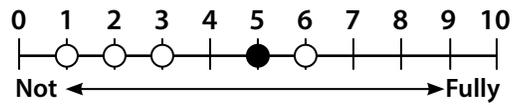
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district had established student achievement goals and outcomes for 2012-13 and was aligning other site and district plans with the LEA Plan. The district was providing fiscal support for these goals. Improvement had been made in developing and approving SPSAs for the current school year that reflect the district's goals. Site budget development practices did not support the timely implementation of programs and plans that affect student achievement.

Summary of Fifth Comprehensive Review, June 2014

The district established student achievement goals and outcomes for 2013-14 and updated and aligned the LEA Plan and the SPSAs before the start of the school year. The district provides fiscal support for the activities in the plans.

Findings

1. The district's Board Policy 6011(a) addresses aligning student achievement outcomes with instructional goals and the need for fiscal support.
2. The LEA Plan has been updated to include the district's 2013-14 goals and outcomes for student achievement. The district provides 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. Departments do not receive budgets, and there is no consistency regarding which requests for materials and supplies get approved or denied.
4. Both school sites updated their SPSAs before the start of the school year and included funding sources, dollar amounts and the person or persons responsible for each activity. School site council members reported that they had no opportunity to provide input on the budget until it was presented to them for approval.

Recommendations for Recovery

The district should:

1. Continue school site budget development and management that facilitates program implementation at the start of the school year 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 development of SPSAs to ensure that 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 2013 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 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 Essential Program Components (EPCs) and supported by student achievement data.
5. Ensure that district and site leadership teams review the LEA Plan annually 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 to share 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

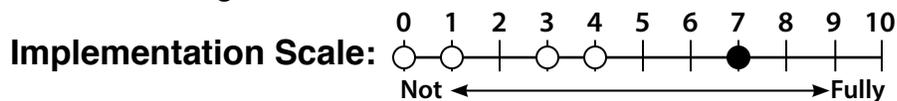
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

The board had policies and an LEA plan with goals and outcomes to support the implementation of a sound instructional program. There was a districtwide effort to align all student achievement plans. New district and site administrators had the knowledge and skills necessary to implement the LEA Plan and SPSAs successfully. The district's most recent activities and priorities clearly indicated a commitment to full implementation of policies and plans for improving student achievement.

Summary of Fifth Comprehensive Review, June 2014

The board has policies and an LEA plan with goals and outcomes that will support the implementation of a sound instructional program. The district has updated and aligned all student achievement plans that reflect LEA policies. District and site administrators are engaged in developing and implementing these plans. School site council members would like to be more actively and meaningfully involved in decision-making, including an opportunity to provide input on the budget.

Findings

1. The district has policies that address this standard and has made 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. The LEA Plan was approved in October 2013 and addresses the fundamental components of a sound instructional program. The LEA Plan has been revised to reflect current goals, outcomes, and updated student achievement data. The district has aligned all student achievement plans including Title III, professional development plans, WASC and others.
3. School site councils (SSCs) are meeting regularly but attendance continues to be low, especially among parent members.
4. SSC agendas and minutes show that the SSCs have reviewed plans, made recommendations and approved the plans. The SSCs received training as required by both board policy and state regulations. However, SSC members reported that they are not included in budget development and only see the budget when they are asked to approve the plan before it goes to the district's administration.

- SSC members and parents indicated that they would like to be more actively involved and included in more decision-making. They believe more parents would attend if the SSC agendas required more parent participation and gave parent members a more meaningful role.

Recommendations for Recovery

The district should:

- Ensure that school site leaders and their staff have the support and resources needed to successfully implement the district's plans and goals.
- Continue to develop SPSAs as working documents that can be monitored, that include specific timelines and budget allocations for each activity, and that assign a person responsibility for implementing the activity. Regularly include on each SSC's agenda a review of progress in implementing the SPSA.
- Continue to provide professional development for all staff in analyzing student achievement data and using the Academic Program Survey (APS) so that staff can participate in the development of the SPSAs and implement the plans effectively.
- 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 there are enough SSC meetings to effectively monitor progress in implementing the SPSA.
- 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.
- 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 support the work done during this time.

Standard Partially Implemented

February 2010 Initial Rating: 1

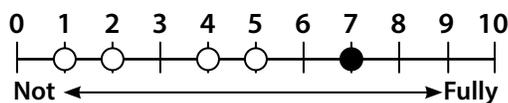
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7

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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to make progress in analyzing and using data to inform improvements. Despite training, some teachers struggled to use School Plan effectively to analyze student data, and the district was considering adopting a more user-friendly data analysis tool. Teachers reported that they analyzed data individually and collaboratively and used the results to improve instruction. Teachers continued using departmental collaboration time to refine benchmark assessments when needed, but the focus of collaboration time had evolved to using assessment results. Teachers had been trained in Constructing Meaning (a research-based program designed to improve instruction for English learners) strategies and understood 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 was in the early stages. The district was making some progress in using data to place students in classes.

Summary of Fifth Comprehensive Review, June 2014

The district has transitioned from School Plan to Aeries Analytics for data analysis and has made this program available to administrators and teachers. Administrators and teachers reported the transition has slowed the analysis of data while teachers learn how to use the new software. Review and analysis of data continues to be one of the activities during collaboration time.

Findings

1. The district has transitioned to Aeries Analytics for data analysis. Professional development on this system was provided to instructional coaches, key lead teachers and administrators. Teachers will receive training and support from key lead teachers. Teachers and site administrators indicated that the system is just beginning to be implemented and that analysis and use of data has slowed as a result. The newly developed district technology plan includes a goal to have all teachers using Aeries Analytics by June 30, 2016.
2. The district continues to use the Aeries student information system to store student enrollment and demographic information. District and site staff continue to use and rely on the data stored in the student information system.
3. Teachers and administrators reported that collaboration time has become more structured. Collaboration time is used for department collaboration, WASC preparation and interdepartmental collaboration. During department collaborations, teachers are planning for the transition to Common Core standards, preparing for the new state assessments, developing or updating benchmark assessments, and analyzing student data. During the

2012-13 school year, teachers were trained in the use of SMART goals and developed and used SMART goals related to California Standards Tests (CST) scores.

4. Teachers continue to focus on implementing Constructing Meaning strategies. The district continues to provide a coach to assist teachers in this process. This year an English learner (EL) specialist is also available to coach teachers on English language development strategies.
5. The state administrator has assigned site administrators to spend 55 minutes per day doing classroom observations and providing feedback to teachers. Site administrators reported that although this goal may not be met every day, they are conducting classroom observations regularly and providing teachers with both positive and constructive feedback.
6. The EL coach provided teachers with professional development on the California English Language Development Test (CELDT) to help teachers better understand the test and the requirements that must be met for students to be reclassified. Teachers reported that this professional development was helpful.
7. Administrators and teachers indicated that the district continues to use the results of state assessments to place students in classes; however, they also reported that other data, including the SRI Reading Test, 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 those districts use 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 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

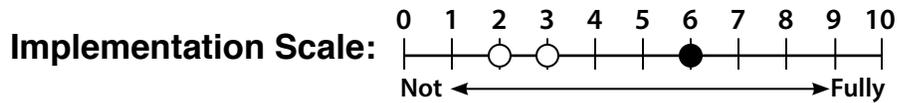
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 6



1.9 Planning Processes

Professional Standard

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

Summary of Fourth Comprehensive Review, March 2013

The district had implemented a revised evaluation system for teachers, and teachers reported that their evaluations had been completed on time. The district had established expectations for administrators and was providing coaches for principals and vice principals to help them meet expectations. A standard walk-through protocol had been developed and was in use. Teachers had received professional development in Constructing Meaning strategies for English learners, and the district had hired coaches to help teachers incorporate these strategies into their instructional practices.

Summary of Fifth Comprehensive Review, June 2014

The district continues to conduct teacher evaluations and has developed a form and process for administrator evaluations. Site administrators hold teachers responsible through classroom observations. District administrators hold site administrators responsible through the administrator review process and weekly reports on observations. Teachers are provided with professional development and coaching support.

Findings

1. The district continues to use the adopted teacher evaluation process and has developed a process to hold site administrators accountable. Site principals are required to develop goals and meet with the state administrator in December, March and June regarding these goals.
2. Site administrators are holding teachers responsible for implementing Constructing Meaning strategies by requiring teachers to submit documentation of their implementation weekly. Site administrators are also conducting classroom observations (also known as walkthroughs) regularly to hold teachers accountable. Site administrators provide verbal feedback to teachers following these walkthroughs. The district is holding site administrators accountable for completing walkthroughs by requiring weekly summaries of the classroom observations. The district provided professional development to site administrators on conducting walkthroughs.
3. Coaches are available to support teachers in meeting the needs of English learner (EL) students and in implementing Constructing Meaning strategies. Coaches provide professional development, conduct model lessons, and provide feedback on classroom observations. The EL coach provided teachers with professional development on the California English Language Development Test (CELDT) so that teachers could better understand the test and what is required for students to be reclassified. Teachers reported that this professional development was very helpful.

4. The principals and vice principals of the comprehensive high schools did not have coaches at the time of the review; however, district staff indicated that they hoped to arrange for these services soon.
5. The district holds site administrators responsible for increased structure for teacher collaboration time. Teachers indicated there was more structure in these sessions. Some teachers expressed support for this structure; others indicated the sessions had become so structured that there was not enough time for group planning and problem-solving.
6. The district provided teams the opportunity to visit other schools to get ideas for meeting students' needs.

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 the district has provided.
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

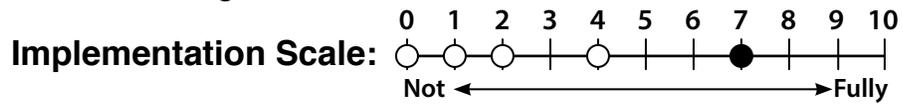
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 5



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)

Summary of Fourth Comprehensive Review, March 2013

The district had 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 was monitored. Training for teachers and administrators using a set of instructional materials for the first time was essential if students were to fully benefit from their use.

Summary of Fifth Comprehensive Review, June 2014

The district continues to provide standards-aligned instructional materials for districtwide use. The Williams review and sufficiency resolution indicate an adequate inventory and use of materials. FCMAT observed the use of approved materials in most classrooms. Monitoring and evaluation tools include the use of appropriate instructional materials.

Findings

1. The district continues to provide standards-aligned instructional materials, including intervention materials, for districtwide use.
2. The state administrator approved the district sufficiency resolution. The board resolution indicated no insufficiencies in instructional materials.
3. The Williams review found that the district has sufficient instructional materials.
4. FCMAT observed an increase in the availability and use of board-approved textbooks in the classroom. However, some science texts are more than seven years old and thus outdated.
5. There was evidence that teachers who are using the board-approved Edge materials for English language development classes have received training in full implementation of the materials.
6. The protocols used to monitor and evaluate teachers and administrators include the use of appropriate materials.

Recommendations for Recovery

The district should:

1. Review its approved textbooks based on publication dates and set priorities for purchasing new materials based on the greatest need, specifically science.
2. Continue to develop and implement a districtwide process for monitoring the use of instructional materials selected for specific courses and for their full implementation. Hold teachers accountable for using 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.
3. 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.
4. Continue to conduct an annual inventory of instructional materials to ensure that all students have sufficient and appropriate materials.

Standard Fully Implemented

February 2010 Initial Rating: 1

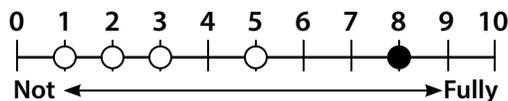
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 5

June 2014 Rating: 8

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The state administrator had set clear goals for improving student achievement and was receiving support from the staff in implementing those goals. There were efforts to ensure that all plans were aligned. There was greater focus on teaching and learning, and on everyone's role in improving student achievement. Collaboration time was being used constructively and was focused on student achievement. Professional development was focused on district plans and goals.

Summary of Fifth Comprehensive Review, June 2014

The district has made significant progress in aligning plans and providing the professional development needed to implement the plans that will lead to improved student achievement. Site administrators and teachers are making numerous changes in practices and procedures to ensure that students' needs are met. However, full and accelerated implementation of these plans and changes needs to occur if the district's goal of improving achievement for every student is to be realized.

Findings

1. The district has made many necessary changes to instructional programs and provided professional development that will lead to improved student achievement. However, the district is not achieving full implementation of these changes rapidly enough to meet the urgent need to improve student achievement.
2. The LEA Plan is being used to provide direction for closely aligning curriculum, instruction and assessment based on standards, frameworks and standards-aligned instructional materials. The plan has been updated to include the district's goals for 2013-14.
3. Site administrators and teachers are receiving training regarding the Common Core State Standards and are planning for implementation.
4. The district has made progress in developing a districtwide plan to improve the programs offered to English learners. However, a significant gap in achievement remains for English learners.
5. Only half of the 32 classrooms FCMAT observed had a clear language objective, and only five required students to respond in complete sentences and to use academic language when appropriate.

6. The collaboration time is being used effectively to support alignment efforts by providing opportunities for teachers to make connections across programs, content areas, and school sites. Some teachers reported that the time allotted for departments to meet is insufficient to implement the program changes they have been asked to make.
7. The professional development the district has provided supports its plans and goals. Training in Constructing Meaning, A Focused Approach: Instruction for English Learners has been provided for all teachers and is supported by a coach at each site. There is evidence that more teachers are implementing these strategies in their classrooms. The district has developed a walkthrough protocol to help monitor implementation.
8. The curriculum council meets regularly with representation from the district and both school sites. This group's discussion topics include new courses, revised courses, and A-G certification. Any member can suggest agenda items. This is an opportunity for leadership development and growth.

Recommendations for Recovery

The district should:

1. Make use of the curriculum council's activities to provide opportunities for teachers to take a leadership role.
2. Continue to 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.
3. 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.
4. 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.
5. 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
6. 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.
 7. 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.
 8. 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

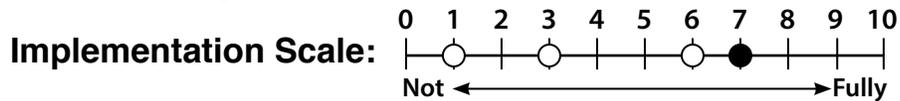
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

The district had 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 was not fully developed or implemented. Teachers did not have all the necessary information to modify instruction for students, especially English learners. There was significant improvement in the use of collaboration time, which would be enhanced by a districtwide assessment system.

Summary of Fifth Comprehensive Review, June 2014

The district has made progress in developing common assessments through collaboration between sites. The change to a new data management system has made sharing and analyzing student achievement a challenge for individual teachers as well as departments. Parent access to the system is available but not yet widely used. More data sources are being used to place students. Coaches are helping acquaint all teachers with CELDT language levels so they can modify instruction for English learners.

Findings

1. The district has developed common assessments in English and math through collaboration between the school sites. Progress has also been made in the other core content areas but is not complete.
2. The new Aries Analytics data management system is not fully operational for sharing student achievement data. Most teachers are using the part of the system that allows parent access to student grade reports and other information. Students and parents reported that only about a third of the parents have been able to, or choose to, access these reports.
3. Teachers reported that they are not able to access student discipline data on the data management system. They believe this data would help increase their ability to improve student achievement.
4. The use of collaboration time varies by school site, but both sites dedicate some time to reviewing student data. Some teachers reported that the time allowed for departments to meet is insufficient, and when they do meet, the site administrator sets the agenda.
5. The use of data to appropriately place students has improved, especially for English learners.

6. English learner coaches are increasing teacher awareness of CELDT language levels. CELDT language levels are provided to all teachers so that instruction can be modified for students' different levels of language proficiency.
7. The district continues to provide support for students who have not passed the California High School Exit Exam (CAHSEE).

Recommendations for Recovery

The district should:

1. Fully implement a districtwide system of assessments and the new data management system so that data 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).
2. Consult with the CSBA to develop and implement a board policy and administrative regulation regarding the regular collection and analysis of common formative and summative assessment data to establish instructional priorities and shape classroom instruction.

Continue efforts to implement the following recommendations provided for this standard in the first and second comprehensive review reports.

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 School Plan system for easy disaggregation of data and analysis. Class rosters should be posted on School Plan 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 School Plan) 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

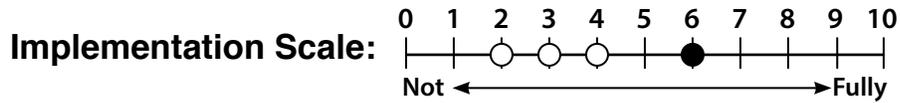
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

Teachers continued to use overhead projectors and white boards when available during direct instruction. Students' use of technology in the classrooms continued to be somewhat limited and was used mostly for research and writing assignments.

Summary of Fifth Comprehensive Review, June 2014

The district has developed a new district technology plan for July 1, 2013 to June 30, 2016 to guide the use of technology. Students are using technology for research, writing, and credit recovery. They also use graphing calculators in mathematics. Teachers continued to use overhead projectors and whiteboards.

Findings

1. FCMAT observed teachers' use of technology for instruction and use of graphing calculators in mathematics classes. Teachers make effective use of overhead projectors and whiteboards to share their work and instructional materials with students. FCMAT observed minimal student use of technology in other classrooms at the comprehensive high schools. Technology is used for credit recovery at the comprehensive high schools and at the alternative school. Students also use technology in computer classes.
2. The district updated its technology plan since the previous visit and has included in its LEA Plan goals for increased integration of technology into the curriculum. The new technology plan is for July 1, 2013 to June 30, 2016. District staff reported that the district has begun implementing this plan, including beginning to implement Aeries Analytics, replacing more than 200 outdated computers this year, and completing some infrastructure improvements to help ensure the availability of hardware and appropriate network speed and capacity for learning activities and online testing. Increased integration of technology into the curriculum is planned but not yet implemented.
3. Several teachers expressed interest in participating in the revision of the technology plan.

Recommendations for Recovery

The district should:

1. Use the interest teachers have in participating in revising the technology plan to help 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 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

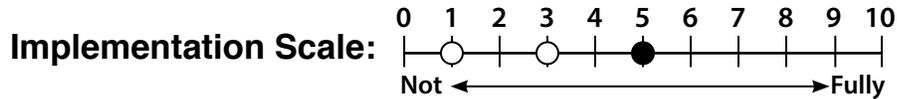
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5



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)

Summary of Fourth Comprehensive Review, March 2013

The district was actively addressing the learning gap among English learners and had plans for continuing this work during the 2012-13 school year. The district had restructured special education programs to include more mainstreaming. There was evidence that training in Constructing Meaning and professional learning communities was beginning to be implemented. Student achievement scores declined for all subgroups, and there was 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.

Summary of Fifth Comprehensive Review, June 2014

The district has put energy and resources into new programs, monitoring practices, and specialized assistance for all students. It has continued to support the implementation of Constructing Meaning. Title I Supplemental Education Services (SES) resources are being used to target 10th grade English learners. A parent institute has been established to help parents better understand their students' educational needs. The district has invested in coaches to support Constructing Meaning and improve the identification and placement of English learners. However, growth in student achievement has not been significant. Requiring full participation by every staff member in meeting the goals the district has established is essential to improving achievement for every student.

Findings

1. The district has placed one full-time equivalent (FTE) instructional coach at each school site to ensure that English learners are assessed and appropriately placed in classes. The coaches also model and monitor the instructional strategies that will accelerate learning for these students.
2. The district has provided training for all teachers in Constructing Meaning (a research-based program designed for secondary English learners). There is evidence that most teachers are making an effort to use these strategies, and administrators and instructional coaches are monitoring the level of implementation in the classroom.
3. FCMAT observed 32 classrooms and found that three or more teachers used seven of the eight EL strategies on the observation protocol. This is a slight increase from the previous review, but the use of strategies to improve and accelerate learning for English learners is not at a level that will result in a significant increase in achievement for

these students. The district has committed resources to Constructing Meaning training, walkthrough monitoring, and coaching.

4. The district is targeting English learners as its priority for Title I SES tutoring services.
5. Both the district English learner advisory committee (DELAC) and the English learner advisory committee (ELAC) are operational and have received training.
6. The district's 2013 state testing results show no significant gains in student achievement and no significant progress in closing the gap for EL students and students with disabilities.
 - CST results for 2013 show that in English language arts, 803 of the 1266 students tested were at the basic, below basic and far below basic levels; 463 students were at the desired proficient and above level.
 - CST results for 2013 show that in Algebra I, 325 of the 346 students tested were at the basic, below basic, and far below basic levels; 21 students were at the proficient and above level. Algebra is a graduation requirement for every student.
 - Disaggregated test results show that the district tested 336 English learners in English language arts, and that 323 of these students scored at the basic, below basic, and far below basic levels. Thirteen English learner students were in the proficient or above category.
 - Disaggregated test results show that the district tested 132 English learners in Algebra I, and that 129 of these students scored at the basic, below basic, and far below basic levels. Three English learner students were in the proficient or above category.
 - The district had 135 students in the far below basic category in English language arts; 110 of those students were English learners.
 - The district had 110 students in the far below basic category in algebra; 54 of those students were English learners.
7. FCMAT observed seven English language development (ELD) and specially designed academic instruction in English (SDAIE) classrooms. Direct instruction with limited interaction with other students was the primary strategy used in all but two classes. These two classes were using a variety of strategies, including numerous opportunities for interaction with other students and the teacher. Students in these two classes also had the opportunity to practice oral language skills. Only these two classes could be identified through observation as intervention for English learners.
8. The number of EL students that have been redesignated as fluent has increased. The EL instructional coaches have made this a focus of their work. Parents, students and teachers all shared concerns that students who exit EL intervention classes as a result of being re-designated have limited options for placement in the appropriate class. Many of the core content classes are full and counselors have difficulty finding an appropriate placement.

9. Special education teachers are co-teaching at one school site and have aide support to better accommodate mainstreamed special education students. Both special and regular education teachers were positive about using this method. The other school site is working to improve its co-teaching program before they resume implementation.
10. Parents expressed concern over equity between the two campuses. They listed music programs, the number of electives offered, and class size as their major concerns.
11. The district is making available to parents the Parents Institute for Quality Education (PIQE), where parents can learn more about how they can help their student(s) be more successful in school. Participation in PIQE is increasing.

Recommendations for Recovery

The district should:

1. Require every teacher to fully implement Constructing Meaning strategies in every class they teach that has one or more English learner students.
2. 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.
3. Continue to support the professional learning community (PLC) professional development that it provided for teachers and administrators.
4. 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 full implementation of the May 2011 Special Education Review report and corresponding action plan.
5. 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.
6. 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.
7. 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, and for 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.

8. See also the related recommendations in Standard 3.17.

Standard Partially Implemented

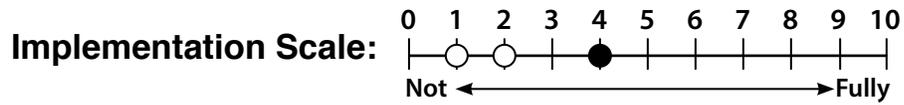
February 2010 Initial Rating: 1

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 4



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).

Summary of Fourth Comprehensive Review, March 2013

Credit recovery courses were 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 existed for additional elective course offerings. There was little change in the number of graduates completing A-G course requirements.

Summary of Fifth Comprehensive Review, June 2014

Elective offerings have increased at both comprehensive high schools. Credit recovery courses are available to students online during the school day, after school, and on Saturdays. Both school sites have improved their ability to develop their master schedules in a timely manner that benefits students and teachers. A-G completion rates are improving but are still low.

Findings

1. Discussion and planning to better align courses at the two high schools are ongoing. Both schools have improved their ability to develop their master schedules in a timely manner to benefit students and teachers.
2. Elective offerings are growing. However, too many students are placed in an elective not by their choice but to fill their schedule.
3. Credit recovery opportunities continue to improve for students.
4. Advanced Placement (AP) participation is increasing at both sites, but there is still a wide variation between the two high schools in teaching strategies, AP offerings, and AP exam results.
5. Alternative education is becoming more organized and a more effective option for students who are at risk and in danger of not obtaining a high school diploma.
6. The number of graduates that have met A-G college entrance requirements is growing but still remains low.
7. Many effective teaching practices are being used throughout the district; they need to be shared and observed by more teachers.

Recommendations for Recovery

The district should:

1. Review and evaluate the differences between the two high schools. This should include student data and scores, available electives and AP courses, class sizes and staffing, materials and supplies, equipment, student activities and clubs, student support systems, and motivational programs. Although the two school sites will never be identical, there are significant differences that need to be addressed.
2. Conduct a review to identify the best teaching practices at the two school sites and to ensure that they are shared and observed by more teachers.
3. 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.
4. Conduct a periodic survey of students and an assessment of outcomes to determine the helpfulness of the counseling services for career and college decisions.
5. 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

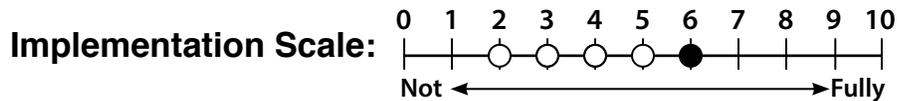
February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6



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)

Summary of Fourth Comprehensive Review, March 2013

Efforts in alternative education had remained constant and stabilized. The district continued to develop and implement procedures and policies for special education.

Summary of Fifth Comprehensive Review, June 2014

The growth and stability of the alternative education program has been a positive asset to districtwide improvement efforts. Special education is becoming more organized and has improved its structure throughout the district.

Findings

1. The structure, organization and efficiency of alternative education and special education continue to improve, and the district is making steady progress in providing better educational outcomes for students and staff.
2. The alternative education program will undergo a WASC review in the 2014-15 school year.
3. There is a significant waiting list for alternative education placement. The alternative education program is currently at capacity with 90 students.
4. The district has improved the alignment of alternative education courses and curriculum with the comprehensive high schools.

Recommendations for Recovery

The district should:

1. Address the significant number of students waiting to enroll in alternative education. This should include efforts to determine the reason for the high number of students requesting alternative education and to identify ways 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 as well as procedures for qualified students to return to a comprehensive high school after being successful in alternative education.

4. Implement the recommendation in the May 2011 Special Education Review report to review district policy regarding certificates of completion. If needed, 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

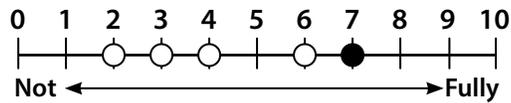
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

Progress continued in establishing regulations and policies in special education. However, progress was slowed by deficiencies in the special education department's chain of command. Regular education teachers' participation in IEP meetings was not sufficient to meet special education requirements.

Summary of Fifth Comprehensive Review, June 2014

Several areas of concern from past years have been addressed in the special education department. A chain of command is evident, student referrals continue to become more streamlined, and ongoing recordkeeping is better organized and more secure. Support staff are not receiving training in instructional practices such as Constructing Meaning, Common Core State Standards and Math I.

Findings

1. Regular education staff still do not always attend individualized education program (IEP) meetings as required.
2. Training opportunities for special education support staff are minimal. The training they do receive is primarily on technical requirements rather than instructional practices.
3. Organizational procedures for special education continue to improve and become more efficient.
4. Communication among special education staff is developing but is not consistent. Implementation of current best practices and expected results for students with active IEPs are not monitored effectively.

Recommendations for Recovery

The district should:

1. Provide special education assistants with training in the teaching strategies that they are to support when they are in the regular education classroom.
2. Continue to work with the special education local plan area (SELPA) to use IEP software and begin to develop coordinated and ongoing training opportunities for staff to keep certifications updated.

Continue addressing the following recommendations that were provided in the March 2011 comprehensive review report.

3. Establish a clear administrative chain of command that provides accountability, communication and follow-through for special education programs, classes, and students with active IEPs.
4. 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.
5. 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.
6. Provide staff development that emphasizes instructional strategies and techniques for teachers who are teaching mainstreamed special education students.
7. 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

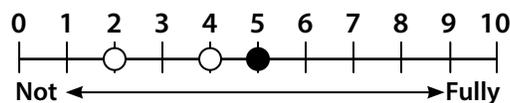
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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.)

Summary of Fourth Comprehensive Review, March 2013

The district was beginning to implement a co-teaching model for mainstreamed students. Although progress continued in special education, the district had 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 continued to be lacking.

Summary of Fifth Comprehensive Review, June 2014

The district continues to increase compliance with state and federal guidelines. The IEP process still has some issues that need to be resolved. Progress is being made in developing a co-teaching model for mainstreamed students, though training and instructional strategies to support this effort are limited.

Findings

1. The district and school sites continue to increase compliance with state and federal guidelines.
2. The IEP process is improving but still has issues that need to be resolved. Teacher attendance at IEP meetings is low, caseloads of special education staff need to be refined, and not all IEP's are current.
3. The district continues to refine the co-teaching model for mainstreamed students. There is limited training for this effort.

Recommendations for Recovery

The district should:

1. Develop a comprehensive vision for special education throughout the district and develop a detailed plan for its implementation.
2. Continue to monitor and support the implementation of co-teaching to ensure that students benefit from this model.
3. 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.
4. 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

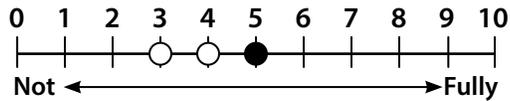
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

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.

Summary of Fourth Comprehensive Review, March 2013

With the inclusion of collaboration days and instructional coaches for teachers at both school sites, the potential existed for significant improvement in instructional strategies, identifiable objectives and outcomes for each lesson, and increased student engagement. However, there continued to be heavy reliance on lectures and worksheets.

Summary of Fifth Comprehensive Review, June 2014

Placement of instructional coaches at each site and continued support for collaboration days have improved the use of Constructing Meaning strategies. Student engagement has improved some but is primarily compliant in nature rather than active. Plans, efforts, and outcomes for collaboration time and professional development vary widely between the two high schools. Opportunities for articulation between the two school sites have increased but remain limited.

Findings

1. Instructional coaches have been placed at each site to support Constructing Meaning and English learner instruction.
2. The district is in its second year of collaboration days. Plans, efforts, and outcomes vary widely between the two high schools.
3. A new assistant superintendent of administrative services is in place and is responsible for instructional planning and implementation, and for staff development.
4. Within the collaboration day structure and staff development efforts, growth in articulation between departments at the two high schools remains limited.
5. Site administrators and instructional coaches regularly conduct walkthroughs of classrooms, which are focused on identifying Constructing Meaning strategies, a posted objective for the lesson, and whether students are engaged in learning. Teachers are provided with written or verbal feedback after the walkthrough.

Recommendations for Recovery

The district should:

1. Develop strategies for improving communication between the two high schools regarding collaboration day expectations, outcomes and plans.

2. Establish specific goals and measurable outcomes for the instructional leadership position. Ensure that this position provides guidance, planning and professional development for all instructional improvement efforts. Responsibilities should also include direct support for the instructional coaches at each site.
3. Continue to strengthen and refine collaboration plans and calendars. Prioritize and set dates for specific collaboration and staff development efforts and trainings.
4. Monitor classrooms for implementation of strategies that increase student engagement.
5. Visit other school sites or districts with similar demographics that have demonstrated high levels of student engagement, resulting in higher achievement for all students.
6. 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.
7. 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

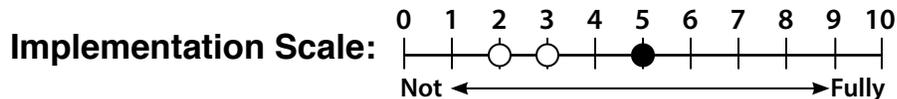
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 5



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.

Summary of Fourth Comprehensive Review, March 2013

The district 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 would move them back in to regular classes and allow them to remain on track for a diploma. The district was reaching out to feeder schools to improve the high school experience for the children in both King City and Greenfield.

Summary of Fifth Comprehensive Review, June 2014

The district is offering more alternatives for underperforming students, students with disabilities, and English learners. The district has increased resources to improve its redesignation rates for English learners. The number of electives continues to be a concern and has surfaced as an issue in appropriately placing students who are exiting intervention during the school year. Parents were appreciative of the opportunity to participate in the Parent Institute for Quality Education (PIQE). Equity in programs and resources between the two school sites continues to be a concern for parents, students and staff.

Findings

1. The district arranged for a representative group of teachers and administrators to visit a high-performing high school to observe practices that have been successful in supporting low-performing students.
2. The district is offering 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. The district is also implementing Link Crew, a program that provides mentoring support for incoming freshmen to help ensure a good start in high school. The district has targeted 10th grade English learners using Title I SES resources.
3. CELDT results show little movement in English language development after students reach language level 3. The district has made it a priority to increase the number of English learners who are reclassified and has assigned a coach to each school site to assist in this effort.

4. The district is involved in collaborative efforts with 10 South Monterey County school districts to develop shared behavioral health services for students.
5. Parents, students and staff would like to see more electives for all students. Students were specifically interested in electives so that placement in open periods or serving as a teacher's assistant are not their only options to fill their schedules.
6. Parents, students, and teachers all expressed the concern that students exiting EL intervention classes as a result of being redesignated have limited options for placement in an appropriate class. Many core content classes are full, and counselors have difficulty finding appropriate course placements.
7. Special education teachers are co-teaching at one school site, with aide support, to better accommodate mainstreamed special education students. Both special and regular education teachers had largely positive opinions regarding using this method. The other school site is making some changes to its co-teaching program before it resumes implementation.
8. Parents express concern regarding inequity between the two campuses, citing music programs, the number of electives offered, and class size as their major concerns.
9. The district is making PIQE available to parents; this institute helps parents learn more about how they can help their student(s) be more successful in school. Participation is increasing.
10. 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.
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 for co-teaching.

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

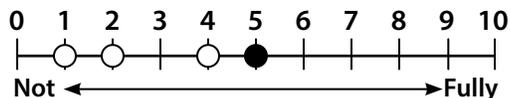
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to make progress in developing a districtwide comprehensive assessment system to ensure that students were placed in and exited from classes appropriately. Common assessments were being developed but were not implemented districtwide for all core content areas. Teachers and administrators had a greater sense of urgency for an assessment system that will support them and help reach the achievement goals set by the state administrator.

Summary of Fifth Comprehensive Review, June 2014

The district continues to work toward full implementation of a comprehensive districtwide assessment system. Progress has been made in the completion of common assessments in English and math. The data management system has changed and is not yet fully functional. Coaches have provided all teachers with the CELDT levels of their students. The district is preparing for the implementation of Common Core State Standards and assessments.

Findings

1. There is evidence that the district has continued to develop a comprehensive districtwide assessment system to ensure that students are placed in appropriate intervention classes or leveled classes.
2. There is evidence of the use of the common assessments that have been developed for English and math. Common assessments for other core content areas are not yet complete but are in development.
3. The district relies on state assessment data, primarily the California Standards Test (CSTs), CAHSEE, and CELDT for individual student placement. The district also considers teacher recommendations when placing students. There is evidence of an increased use of local data when it is available.
4. The district has changed the data management system to Aries Analytics. Teachers are being trained in the use of the new system but report that it is not yet fully functional. This restricts their ability to share data in a timely manner and to monitor progress.
5. There is evidence that teachers and departments use data when available to guide conversations about improving student achievement. The district now has a coach at each site to provide teachers with a CELDT level for every English learner enrolled in their classes.

6. The district is addressing the shift to common core standards and the new state assessment system. Teachers are increasing opportunities for students to write in response to the expectation that written responses will be required in all content areas in the new common core assessments.
7. The district continues to provide support for students who need it to help pass the CAHSEE or need credit recovery options.
8. 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.

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 not limited to the standards 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. See the related recommendations in Standard 2.4.

Standard Partially Implemented

February 2010 Initial Rating: 2

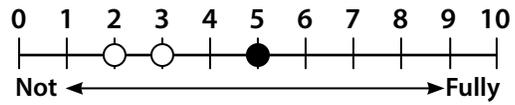
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district made progress in analyzing the needs of English learners through a more thorough review of CELDT scores, and was providing training for all teachers and administrators in Constructing Meaning and support for implementation. The district had developed goals to address the needs of English learners and was reviewing federal monitoring program (FPM) results and resolving areas of noncompliance. The board was addressing the needs of English learners. Proper identification, targeted and appropriate instruction, and an exit strategy for English learners needed to be implemented to ensure success for these students.

Summary of Fifth Comprehensive Review, June 2014

The district has resolved the federal program monitoring (FPM) areas of noncompliance and is supporting professional development in strategies for supporting English learners. CELDT testing and redesignation rates have improved. Teachers have the materials they need. Full implementation of instructional strategies and materials for English learners remains a challenge. In a district with significant numbers of English learners, every teacher must be held responsible for using appropriate instructional strategies if these students are to be successful.

Findings

1. The district English learner advisory committee (DELAC) and the English learners advisory committees (ELACs) at both sites are operational.
2. The district has placed instructional coaches at each site who are responsible for ensuring that English learner (EL) students are assessed appropriately and redesignated as fluent when they meet the criteria. Redesignation rates have increased at both sites.
3. The district has addressed many of the issues related to program compliance, including board policies, plans, instructional materials purchases, and a master schedule that accommodates EL students.
4. Teachers using the Edge materials received training. In the English language development (ELD) classroom observations conducted by FCMAT, the Edge textbooks were available but not in use.
5. The district continues to support Constructing Meaning, a researched-based program for secondary EL students designed to help teachers incorporate academic language instruction into their content area instruction. There is evidence that many teachers are using these strategies but the degree of implementation varies. The language objective

was posted in most of the classrooms FCMAT observed. Eight teachers of the 30 observed were addressing the objective in their instruction.

6. The district is using tutoring, appropriate placement in intervention and leveled classes, and Constructing Meaning strategies in all classrooms to meet the needs of the large number of EL students who do not progress past language level 3 on the CELDT.
7. The district has not met the Title III Annual Measurable Achievement Objectives (AMAOs) for 10 years. There is a significant gap between EL students and other student groups.
8. The district has enough trained and qualified teachers and staff to assess and support the significant number of EL students and their parents.
9. There was some difference between the instructional strategies used in ELD and specially designated academic instruction in English (SDAIE) classrooms and those used in regular classrooms. A focus on language development and the strategies that will accelerate learning for EL students was not evident in most classrooms. There were very few opportunities for EL students to use expressive language and academic vocabulary. There was little evidence in the FCMAT classroom observations that students in ELD and SDAIE classes, or any other classes, were required to use complete sentences in their oral language. The district has a significant number of EL students and low-performing students, and the instructional strategies that address their needs must be evident in every class in which they are enrolled if these students are to succeed.

Recommendations for Recovery

The district should:

1. Closely monitor the use of Constructing Meaning and SDAIE strategies in all classrooms in which English learners are enrolled.
2. Continue to 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 help assess, place, monitor and exit EL students.
3. Continue to monitor and support ELD and SDAIE classes to ensure that instruction is appropriate for English learners and their specific language levels.
4. Continue to provide all teachers with the CELDT language levels of all of the EL students 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:

5. 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.
6. 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.
7. 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.
8. See the related recommendations in Standard 3.1

Standard Partially Implemented

February 2010 Initial Rating: 1

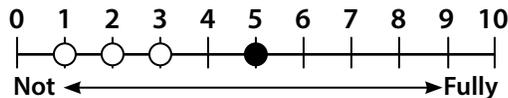
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district chose leaders at both sites who were able to support the changes needed to improve achievement for all students, and it was using current staff members' expertise to provide professional development and support for implementation. Collaboration time was focused on improving teaching and learning and included additional time for professional development. The district needed to ensure that there was continued support for the progress made in improving services for special education students.

Summary of Fifth Comprehensive Review, June 2014

Parents and students were complimentary of the site administrators. The addition of coaches at each site has increased the support for instruction of EL students. Parents, students, teachers, and site administrators all expressed a need for additional counselors. Graduation rates and A-G completion rates remain low.

Findings

1. The district has placed an instructional coach at each school site to support Constructing Meaning implementation, the use of CELDT levels, and related instructional needs of EL students.
2. The district provides a full-time counselor at each school site. Each counselor's load is more than 900 students. Parents, teachers and students would like to have at least one more counselor at each site.
3. A variety of opportunities are available for students to work with tutors, including collaboration with the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR-UP), a U.S department of education grant-funded program designed to increase students' readiness for and success in post-secondary education.
4. The district has hired a special education director who also serves as the principal for the alternative education programs. The director will be focusing on program quality and compliance.
5. Co-teaching and instructional aide support is in place at one school site to support special education students who are mainstreamed into regular classes. The other site is providing aide support for mainstreamed students but is revising its co-teaching plan.
6. Three hundred thirty-four students graduated from the district in 2013. Of these, 69 completed A-G requirements and 265 did not.

Recommendations for Recovery

The district should:

1. Work to decrease its student-to-counselor ratio to improve A-G completion rates and graduation rates.
2. Continue to use the expertise of its own staff to provide professional development and to support implementation of the training.
3. Work with a specialist in English learner instruction to ensure that its EL program results in academic success for students.
4. 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.
5. 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.
6. Continue to support the changes that have been made to provide appropriate settings and instruction for special education students.

Standard Partially Implemented

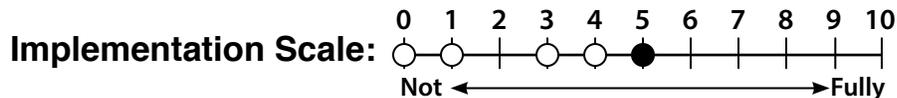
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5



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, 51226)

Summary of Fourth Comprehensive Review, March 2013

The district had not yet implemented this standard. Although the district was constrained by limited resources, this was an area that needed to be addressed to meet the needs of the students and the community. The district continued to offer courses in agriculture, with community involvement and student participation. It had the potential to develop other career-technical programs but had not yet done so.

Summary of Fifth Comprehensive Review, June 2014

Both school sites' development and implementation of master schedules have become more efficient and timely. The number of advanced placement (AP) and elective offerings has increased. Some vocational programs have more staff and course offerings. Community involvement and support is steadily increasing.

Findings

1. The district is still exploring and developing comprehensive multiyear programs that integrate academic and technical studies organized around areas of local interest or industry needs.
2. The district and school site websites continue to improve and provide the community with current and relevant information.
3. School board members demonstrate a strong understanding of the district's needs and knowledge of educational practices and terminology.
4. The district's relationship with its feeder districts is strengthening and is apparent to local community members.
5. Instructional materials and technology hardware have been updated. Both high schools have added new computer labs and faster broadband access.
6. Class sizes are large in agriculture classes that use equipment that requires close monitoring by an adult. This creates a safety issue that needs to be addressed as soon as possible. In addition, this situation limits the teacher's ability to provide a quality experience for all students in the class.
7. There is significant local knowledge in the community that would be invaluable to the district as it continues to design courses of study and real-world applications.

8. Monies are allocated to the sites but are not budgeted according to departments' needs and requests for supplies and materials and thus may not align with the departments' instructional goals.

Recommendations for Recovery

The district should:

1. Increase the number of community members and the participation of the local community in school site advisory groups.
2. Establish sequential course offerings that allow students to pursue an identified technical and academic interest.
3. Continue to refine the student scheduling and placement process so students are placed in electives they have selected. Develop additional elective courses in areas of study in which students have demonstrated an interest.
4. Develop department budgets for materials and supplies at each school site.
5. 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.
6. 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.
7. Develop advisory groups made up of laypeople and community members to further develop an infrastructure for vocational planning and partnerships.

Standard Partially Implemented

February 2010 Initial Rating: 1

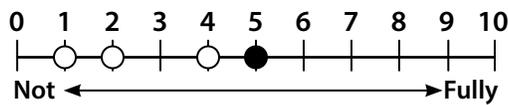
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Teachers continued to collaborate in school department teams to analyze student data and develop or refine common assessments, and they were working in interdepartmental PLCs to implement Constructing Meaning strategies. Teachers and administrators had begun to make some progress in using assessment results and classroom observations to improve instructional practice. Some teachers had begun to change their classroom practices but in many classrooms these strategies were not evident. There was also little collaboration between the two comprehensive high schools.

Summary of Fifth Comprehensive Review, June 2014

Teachers continue to collaborate to develop or refine common benchmark assessments and analyze student data. The district has improved collaboration between the two comprehensive high schools on benchmark assessments. The district purchased new software to help analyze assessment results. Mathematics and English language arts teachers are conducting joint scoring sessions and planning based on assessment results.

Findings

1. Teachers continue to work collaboratively to develop and refine benchmark assessments. Teachers and administrators reported progress in collaboration between the two comprehensive high schools in this effort. Mathematics teachers from both school sites are collaborating on the implementation of Math 1, an integrated mathematics program. Teachers are working together to develop common benchmarks for this program, and both sites are administering the same benchmarks in all Math 1 courses. English teachers continue to collaborate across sites and are working to develop common performance tasks to provide students with practice in tasks similar to those that will be included in the Smarter Balanced Assessment tests. English teachers and math teachers collaborated on scoring the common assessments and determining next steps based on the results.
2. The district replaced School Plan, the software used for a number of years for data analysis, with Aeries Analytics. Professional development in the new software has been provided to administrators, coaches and key teachers. The newly developed district technology plan includes a goal that all teachers will use Aeries Analytics by June 30, 2016. Teachers and administrators indicated that analysis of data and collaboration designed to use assessment results to help develop improvements have been slowed by the change in systems. Teachers and administrators indicated that the new software is powerful and they anticipate being able to do all the needed analysis as soon as staff learn to use the new system.

3. See related findings under Standard 5.3.

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. 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

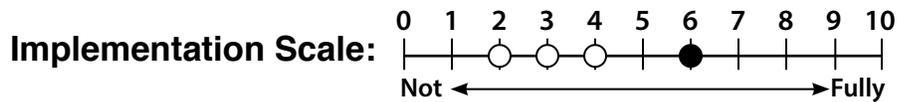
February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The district was providing teachers and administrators with the Aeries student information system and School Plan for analysis of assessment data. Teachers were provided with professional development in the use of School Plan and in using assessment data in instructional decisions and monitoring. However, use of School Plan was inconsistent.

Summary of Fifth Comprehensive Review, June 2014

The district continues to use the Aeries student information system and is now also using Aeries Analytics software for data analytics. Professional development on the new analysis software has been provided to district and school site leaders, and professional development for teachers is under way.

Findings

1. The district continues to use Aeries as its student information system and has added Aeries Analytics to its software suite, replacing School Plan, the software previously used for data analysis. Professional development has been provided to administrators, coaches and key teachers so they can train and support other staff. The newly developed district technology plan includes a goal of having teachers using Aeries Analytics by June 30, 2016.
2. Teachers and administrators indicated that the change in systems has slowed analysis of data and collaboration designed to use assessment results to influence and shape improvements. Most teachers FCMAT interviewed were not yet using Aeries Analytics and anticipated that the rollout would take time. However, teachers and administrators indicated that the new software is powerful, and they anticipate being able to do all the needed analysis as soon as staff have time to learn the new system.
3. See related findings under 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 help all students achieve 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 School Plan 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

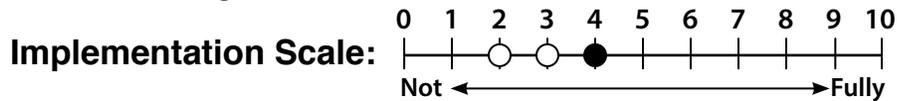
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The district was beginning to monitor students who needed 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 had adopted a goal to develop and implement interventions for students who need them.

Summary of Fifth Comprehensive Review, June 2014

The district continues to make progress in monitoring students' needs and providing options for struggling students as well as advanced students.

Findings

1. District and school site administrators reported a focused effort to provide additional supports for struggling students. Teachers and administrators reported an increase in monitoring of students who need support and an increase in interventions to meet students' needs. A student services technician uses the gradebook system to identify students who need additional support and communicates with parents to ensure that both the parents and the student understand the options available for intervention and support.
2. Both school sites continue to provide after-school tutoring in core subjects and credit recovery options. Saturday school is offered for credit recovery to help students who do not have time for credit recovery during the school day. In-school and after-school California High School Exit Exam (CAHSEE) preparation sessions are provided. The after-school sessions are open to anyone who wishes to attend, but staff reported that these sessions are not well attended. Title I Supplemental Educational Services (SES) resources are used to target 10th grade English learners. Staff also reported that students are able to retake courses they fail if desired; however, because they were not initially successful, staff work with these students to determine if other options, such as online credit recovery, would better support student success.
3. During FCMAT's fieldwork for the fourth comprehensive review in 2012, teachers reported that discipline problems were hindering efforts to support struggling students. During fieldwork for this fifth comprehensive assessment, administrators and teachers reported an improved school climate and decreased discipline problems. Teachers would like to have access to discipline information on the data management system.
4. The district continues to use the results of state assessments to place students in class, as well as the results of local assessments, teacher recommendations and course

grades. Students who are both English learners and one to two grade levels behind in English language arts continue to be placed in two-period block classes. This year, the district is working to improve these block classes by providing core instruction for one period and structured English language development in the second. Staff reported that this structure helps provide more focus on English language development.

5. Coaching is available to help teachers use Constructing Meaning, English language development and SDAIE to help EL students develop fluency in English as well as proficiency in mathematics and English language arts as measured on state assessments. Coaches help teachers analyze data and also help by modeling lessons and providing feedback after observing teachers implementing specific strategies. Teachers report that the coaching is helpful. FCMAT observed some use of Constructing Meaning strategies during fieldwork. Sentence frames and specific language objectives were observed in some classrooms. Math 1 classes consistently included questions about how students approached solving problems and why they took the approach they took. Teachers reported that this increased use of language in mathematics is new to both them and the students. Teachers indicated that they were working on learning the new approach but added that they thought this change would improve student achievement.
6. District and school site administrators and the EL coaches reported a more focused effort on English language development and reclassification of English learners who have achieved proficiency in English. Staff reported that more students were redesignated as English proficient this school year compared to the same time last year. School sites were celebrating this success with students and the community. Staff reported that teachers are provided CELDT scores for students, though not all make use of this data.
7. Mathematics teachers from the comprehensive high schools are collaborating on the implementation of Math 1. Teachers developed common benchmark assessments and met to review the results and plan next steps.
8. Administrators and teachers reported that, although progress is being made, additional work is needed to increase the rigor in the classroom and to help students meet the challenges of a rigorous curriculum. Teachers and administrators indicated that there was an increase in AP offerings. For example, AP Spanish literature and culture as well as AP government are now being offered at Greenfield High School. Teachers expressed the hope that more AP classes can be added in future years. Teachers and students also expressed support for agriculture classes to engage students in the core content and expressed support for offering more sections of agriculture classes.

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 teachers with professional development and ongoing coaching support, 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

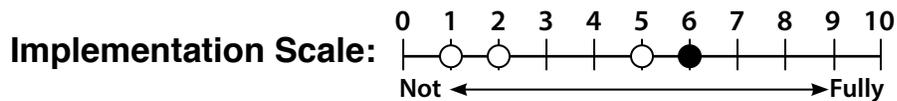
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The site and district plans required by state and federal funding were being developed, implemented and monitored by both district and site administrators. There was a concerted effort to update and align all site and district plans. School site councils were organized and operational. District and site administrators, district support staff, teachers and board members were all participating in professional development activities.

Summary of Fifth Comprehensive Review, June 2014

The district has made progress in developing and implementing the plans required of federally funded programs, and has done some alignment of plans to reduce duplication of effort. School site councils are functioning but requested the opportunity to provide input on the budget.

Findings

1. The district has updated its LEA Plan to include current student achievement data and improvement goals for 2013-14.
2. Single plan for student achievement (SPSA) updates were completed before the start of the school year. They include budget estimates and timelines that allow for the timely implementation of programs that directly affect student achievement.
3. School site council members have been involved in reviewing plans and making recommendation; however, they reported that they do not have the opportunity to provide input on the budget and expenditures as is required.
4. The district's professional development plan has been updated to ensure that professional development supports full implementation of all site and district improvement plans.
5. School site and district administrators are monitoring the implementation of improvement plans (LEA Plan, SPSAs, WASC, and Title III).
6. Administrators and teachers are participating in district-provided training that was planned based on students' academic needs.

Recommendations for Recovery

The district should:

1. Review the California Department of Education's (CDE's) guidance on the role and responsibilities of school site councils, and ensure that it is in compliance.
2. 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.
3. Review plans each year to determine whether the activities included in the plans and the allocation of resources are helping reach student achievement goals.
4. Consider creating a leadership team to help monitor district plans. The leadership team should include district and site administrators, teachers, classified staff, school site council 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:

5. Ensure that district and site budgets support the professional development activities, starting with those identified as the highest priority.
6. Ensure that district and site administrators take responsibility for monitoring the implementation of professional development.
7. 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

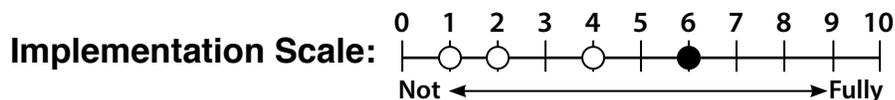
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

There was significant progress in monitoring program implementation. All personnel were aware of the goals and expectations outlined by district and site administrators. Teachers had requested consistent and constructive feedback from administrators' and coaches' regular classroom walkthroughs. District and site administrators were knowledgeable and skilled in monitoring all aspects of the district's instructional programs.

Summary of Fifth Comprehensive Review, June 2014

Plans and protocols are in place for monitoring program implementation. Time has been dedicated for program monitoring, and everyone is aware of the expectations. However, the depth of commitment to implementing instructional strategies to accelerate learning for English learners and the lowest-performing students varies widely from classroom to classroom.

Findings

1. The district continues to make progress in monitoring the implementation of programs. The school site administrators are knowledgeable and skilled in monitoring all aspects of the instructional programs on their campuses and are fully engaged in the process. Coaches also participate in this effort.
2. Principals, assistant principals and coaches all conduct regular classroom walkthroughs and have goals to increase the time they spend in classrooms. 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 and reviewing agendas, and reviewing minutes.
4. The WASC review process includes active participation by teachers and administrators, and WASC activities are included in collaboration time as needed.
5. FCMAT's classroom observations and interviews with teachers revealed that there is a wide range in the depth of commitment to the instructional strategies that will accelerate learning for English learners and the lowest-performing students.

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 teachers' input on the development of protocols for classroom walkthroughs.
2. Consistently provide feedback to teachers regarding 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 regarding the number of classrooms in which he or she saw language objectives in use, and share examples of well-written objectives and 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

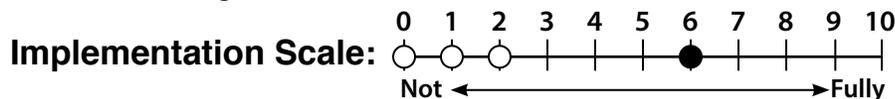
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued 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 impeded the implementation of practices and procedures designed to benefit students.

Summary of Fifth Comprehensive Review, June 2014

Improved organization and communication have occurred in the special education program. The cohesiveness of the staff is increasing. A number of issues are still being addressed and corrected, but progress is being made. Board policies that affect special education are regularly reviewed and updated.

Findings

1. With the assignment of a director of special education and alternative education, organization and communication have improved in the special education programs.
2. Teachers throughout the district still have a limited understanding of the policies and procedures that ensure the appropriate application of special education rules and regulations.
3. Efforts are increasing to provide district and school site communications, rules and policies in Spanish on the district's and school sites' websites.
4. The board reviews and updates policies that affect special education.

Recommendations for Recovery

The district should:

1. Continue the positive and productive changes that are evident in the special education department.
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.

Standard Partially Implemented

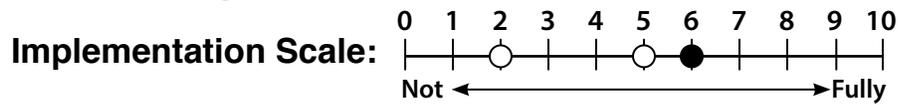
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The district made significant progress in developing and implementing a continuing program of professional development. Teachers and site and district administrators were implementing Constructing Meaning strategies, participating in PLCs, and had begun discussions on implementing common core standards. There were collaborative efforts with feeder districts to share professional development. Board members were participating in study sessions with the state administrator.

Summary of Fifth Comprehensive Review, June 2014

The district continues to make progress in implementing a coherent professional development plan. Teachers and administrators continue to focus on implementing Constructing Meaning strategies and on implementing Math 1, the Common Core State Standards, and the new Smarter Balanced Assessments.

Findings

1. The district has established a professional development plan for the year and a schedule for professional development activities, consistent with the professional development goals expressed in the LEA Plan. The district continues to focus on implementing Constructing Meaning strategies and has expanded effort to ensure that ELD helps English learners achieve fluency in English. The district is also implementing Common Core State Standards and preparing students for the upcoming change in the state assessment system. The district planned and budgeted for team visits to successful schools to help staff gain a broader view of how the district might change its practices to better meet students' needs.
2. The district is implementing its plans for professional development and is making progress in each focus area. The mathematics teachers received professional development and collaborative planning time to implement Math 1, and teachers from both comprehensive high schools are working together to implement that curriculum. Math teachers are focusing on including more language activities in mathematics classes, asking students to explain their approaches to solving problems and their rationale for the selected approach. Although teachers at the two comprehensive high schools reported preparing for Math 1 at different times, teachers at both schools indicated that they are working together to learn this new approach to mathematics instruction. English teachers recognized the need to prepare for performance-based assessment tasks so that students are ready for the implementation of the Smarter Balanced Assessments. They are working together on performance tasks and indicate that these preparation activities are helpful.

The district sent a team with representatives from both comprehensive high schools to a science, technology, engineering and mathematics (STEM) conference to help those subjects envision how changes could be made to increase rigor in the curriculum.

3. The district continues to provide funding for coaches to help teachers meet the needs of English learners and implement Constructing Meaning strategies. Some teachers reported having the coach model lessons; others reported having the coach observe them using a new strategy and provide feedback. The coaches indicated that more teachers are seeking their assistance this year than last year and that they were seeing more of the Constructing Meaning strategies in classrooms. FCMAT also observed these strategies in some of the classrooms visited. For example, sentence frames were being used in some classrooms. The administrators, coaches and teachers indicated that a larger number of English learners were reclassified this year and commented they thought this was because of improved support to students and improved monitoring.
4. School site and district administrators indicated that teachers are held accountable for implementing the strategies covered in professional development. Although the process differs slightly at the two comprehensive high schools, teachers at each school are accountable to their site administrator for implementing Constructing Meaning strategies. All math teachers are teaching at least one Math 1 session so they are all engaged in implementation of this subject. School site administrators are conducting classroom observations, which include looking for implementation of Constructing Meaning strategies. Coaches are also monitoring implementation of strategies and providing ongoing feedback to teachers.
5. The district implemented changes to its schedule for developing the SPSAs so that plans aligned with district goals could be finished before the start of the school year. Site plans were updated in June, and although the budget was not final at that time, estimates based on the prior years were provided and were adjusted when final numbers were made available in the fall. Funds were identified to support professional development much earlier this year than in previous years.

Recommendations for Recovery

The district should:

1. 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.
2. 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

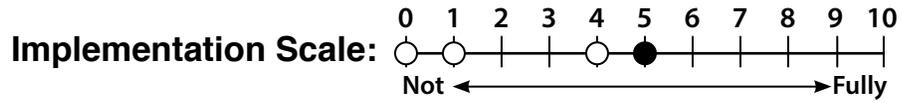
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 4

June 2014 Rating: 5



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.

Summary of Fourth Comprehensive Review, March 2013

Teachers had weekly collaboration time and were using it to work in department teams, interdisciplinary groups, committees focused on preparing for the WASC review, and school committees. Collaboration time was being used to analyze data, share strategies and effective practices, and plan improvements.

Summary of Fifth Comprehensive Review, June 2014

Teachers continue to use weekly collaboration time for department collaboration, WASC preparation, and cross-curricular collaboration. Collaboration activities include data analysis, curriculum development and refinement, discussion of effective instructional practices, and development of benchmark assessments.

Findings

1. Teachers and administrators indicated that weekly collaborations continue to be used for a variety of purposes, including department collaborative activities such as development of common benchmark assessments, data analysis, curriculum development, and sharing of effective instructional strategies. The weekly collaboration time is also used for WASC preparation and collaboration across departments. English learner (EL) and Constructing Meaning coaches help teachers focus on improving instructional strategies. Teachers reported that they were trained on the creation and use of SMART goals last year and used SMART goals last year in their collaborative sessions to help focus preparations for the state assessments.
2. Teachers and administrators indicated that administrators structure collaboration time. Although some teachers reported that collaboration time is more effective now than it was several years ago when it was less structured, others reported that it is sometimes too structured and that this interferes with their department planning time.
3. Teachers and administrators reported that the change in data analysis software has slowed data analysis efforts as teachers learn the new system. Implementation of the Aeries Analytics system is still in the early stages.
4. Administrators and teachers reported increased collaboration between the two comprehensive high schools. The mathematics teachers are collaborating on the countywide effort to implement Math 1, an integrated mathematics program. King City High School teachers reported they began planning for the implementation of Math 1 last year. Greenfield High School teachers did not become involved in planning until the summer of 2013 for implementation at the beginning of the 2013-14 school year. At

the time of this review, teachers from both schools had met to plan curriculum, develop common benchmark assessments, and score the assessments. English teachers also reported collaboration between the school sites as they work to prepare, implement and score performance-based assessment tasks.

5. Administrators and teachers continued to express concern over the results of the 2012-13 statewide assessments, especially with regard to the decrease in the percentage of students scoring proficient or above on the California Standards tests in mathematics.
6. Teachers and administrators indicated that a larger number of EL students were reclassified to English proficient and expressed their belief that the focus on Constructing Meaning and English language development had contributed to the success in this area.

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 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

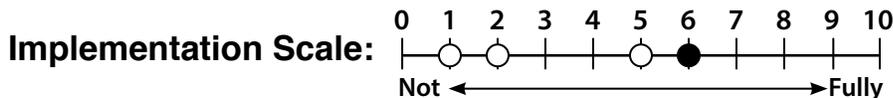
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The LEA Plan included estimates and funding sources to support its implementation. All teachers and administrators were trained in PLCs and in Constructing Meaning and were using and implementing this training. The district was 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.

Summary of Fifth Comprehensive Review, June 2014

The LEA Plan included professional development goals as well as funding sources to support articulated professional development plans. The district has developed and is implementing a professional development schedule.

Findings

1. The LEA Plan approved by the state administrator on October 9, 2013 includes goals, estimates and funding sources for professional development. The goals focus on improving instructional practices in core academics; promoting rigorous and challenging instructional programs for all students; improving materials development including use of technology; and enhancing positive school climate.
2. Professional development activities for the 2013-14 school year focus on helping the mathematics teachers implement Math 1; supporting the English language arts teachers in implementing the Common Core State Standards and preparing students for performance-based assessments; helping teachers learn to use the Aeries system for data analysis; and continuing to implement Constructing Meaning strategies and the English language development curriculum to help EL students become proficient in English and achieve proficiency or better in English language arts and mathematics.
3. The district developed and distributed a professional development calendar for the 2013-14 school year that includes dates for planned professional development activities. School site plans are aligned with the district's professional development plans.
4. In addition to planned professional development sessions, the district's professional development plan includes funding for EL and Constructing Meaning coaches, who are helping teachers implement the strategies learned. Teachers reported that the coaches were helping them improve by modeling lessons, providing feedback, and assisting in collaborative efforts to examine and improve practices.

5. 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 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

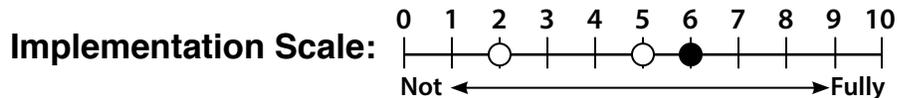
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6



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))

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.

Summary of Fifth Comprehensive Review, June 2014

All CALPADS submissions for the 2012-13 school year were completed and certified. The required submissions were under way for the 2013-14 school year.

Findings

1. The district submitted and certified all CALPADS submissions during the during the 2012-13 school year, including Fall 1, Fall 2, Spring and End of Year 1-4. The 2013-14 Fall 1 data was certified on December 12, 2014, prior to the reporting deadline. At the time of this review, the Fall 2 submission was under way and staff reported that the submission would be certified by the March 28, 2014 deadline. School site administrators reported that they continue to review and sign CALPADS reports before the district certifies the data. Staff reported that the district consistently communicates with sites regarding the importance of submitting accurate and complete data to the state. Staff reported that some course-related data issues were identified and resolved during the past fiscal year as the district continues to focus on collecting, maintaining and reporting high-quality data.

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

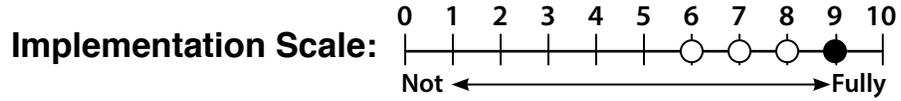
February 2010 Initial Rating: 6

March 2011 Rating: 7

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9



Appendix A

Source Documents

The following source documents were used by FCMAT to evaluate the standards in the Pupil Achievement section.

1. Local Education Agency (LEA) Plan, October 2013
2. Greenfield High School Single Plan for Student Achievement
3. King City High School Single Plan for Student Achievement
4. District and site CST Results, 2012-13
5. District and site CAHSEE Results, 2012-13
6. CELDT report, 2012-13
7. Consolidated Programs Application, 2013-14
8. Title III Plan, 2013-14
9. Professional Development Plan, 2013-2014
10. Schedule of valuations for teachers and site administrators, 2013-14
11. Evaluation tools for teachers and site administrators, 2013-14
12. Board resolution for sufficiency of textbooks, 2013-14
13. Textbook inventory, 2013-14
14. District technology plan, 2013-16
15. Local service plan for special education
16. Sample IEPs
17. Classroom observation tools
18. School site council membership list for both schools
19. School site council schedule of meetings, agendas, and minutes, 2013-14
20. School site council training dates and training content, 2012-13 and 2013-14

21. Current vision, mission, and goal statements, 2013-14
22. Benchmark assessments, 2013-14
23. Master schedules for each site
24. Board policies

Appendix B

Positions and Groups Interviewed

The FCMAT pupil achievement team interviewed the following positions and groups to evaluate the standards in the Pupil Achievement section.

1. State administrator
2. Assistant superintendent for administrative services
3. Chief business official
4. Principal, Greenfield High School
5. Assistant principal, Greenfield High School
6. Principal, King City High School
7. Assistant principal, King City High School
8. Special education director/alternative education principal
9. Counselors
10. Instructional coaches
11. Technology coordinator
12. Teachers – representative group from each site
13. Special education instructional assistants
14. School safety officers
15. Board members
16. Parents – representative group from each site
17. Students – representative group from each site
18. King City Elementary School superintendent

Table of Pupil Achievement Ratings

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
1.1	<p>LEGAL STANDARD – PLANNING PROCESSES</p> <p>Categorical and compensatory program funds supplement and do not supplant services and materials to be provided by the LEA. (20 USC 6321)</p>	0	1	2	4	6
1.3	<p>PROFESSIONAL STANDARD – PLANNING PROCESSES</p> <p>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.</p>	1	1	1	3	4
1.4	<p>PROFESSIONAL STANDARD – PLANNING PROCESSES</p> <p>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.</p>	1	2	3	6	5
1.5	<p>PROFESSIONAL STANDARD – PLANNING PROCESSES</p> <p>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)</p>	0	1	3	4	7
1.6	<p>PROFESSIONAL STANDARD – PLANNING PROCESSES</p> <p>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.</p>	1	2	4	5	7

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
1.8	<p>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)</p>	2	2	3	6	6
1.9	<p>PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA holds teachers, site administrators, and LEA personnel accountable for student achievement through evaluations and professional development.</p>	0	1	2	4	7
2.1	<p>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)</p>	1	2	3	5	8
2.3	<p>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)</p>	1	1	3	6	7
2.4	<p>PROFESSIONAL STANDARD – CURRICULUM The LEA has developed and implemented common assessments to assess strengths and weaknesses of the instructional program to guide curriculum development.</p>	2	2	3	4	6
2.5	<p>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.</p>	1	1	3	3	5

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
3.1	<p>LEGAL STANDARD – INSTRUCTIONAL STRATEGIES</p> <p>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)</p>	1	2	2	4	4
3.6	<p>LEGAL STANDARD – INSTRUCTIONAL STRATEGIES</p> <p>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).</p>	2	3	4	5	6
3.7	<p>LEGAL STANDARD – INSTRUCTIONAL STRATEGIES</p> <p>The LEA provides an alternative means for students to complete the prescribed course of study required for high school graduation. (EC 51225.3)</p>	2	3	4	6	7
3.10	<p>LEGAL STANDARD – INSTRUCTIONAL STRATEGIES</p> <p>The LEA has adopted systematic procedures for identification, screening, referral, assessment, planning, implementation, review, and triennial assessment of students with special needs. (EC 56301)</p>	2	2	4	4	5
3.12	<p>LEGAL STANDARD – INSTRUCTIONAL STRATEGIES</p> <p>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.)</p>	3	3	3	4	5

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
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	5
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	5
3.16	PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA makes ongoing use of a variety of assessment systems to appropriately place students at grade level, and in intervention and other special support programs. (DAIT)	2	2	3	3	5
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	5
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	5
3.22	PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA offers a multiyear, comprehensive high school program of integrated academic and technical study that is organized around a broad theme, interest area, or industry sector. (EC 52372.5, SBE 51226)	1	2	4	4	5

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
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	6
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
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	6
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	6
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	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	6

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
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
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	6
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
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	9
Collective Average Rating		1.37	1.87	2.87	4.50	5.78

The collective average ratings for all years are based on the subset of priority standards used beginning with the second 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)

Summary of Fourth Comprehensive Review, March 2013

Although the culture at the district had changed with the appointment of the new state administrator, the district had 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 converted its internal fraud hotline to the WeTip hotline; however, many employees were unsure what could be reported through WeTip.

Summary of Fifth Comprehensive Review, June 2014

The district's staff conveyed a more positive attitude about the district in general. The district distributed the code of ethics to all employees in their annual employee handbook; however, there is no requirement that each employee acknowledge receipt of the policy or that they review the policy. The district also did not provide ethics training to employees. The WeTip program continues, but posters and flyers do not identify fraud as something that may be reported..

Findings

1. In interviews, district staff members indicated that the district is continuing its efforts to improve its culture and includes its code of ethics policies in the employee handbook provided to all employees. Most district staff indicated that they reviewed the code of ethics when they received their employee handbook this year; however, the district did not provide documentation to FCMAT to indicate that employees sign an acknowledgement of having received or reviewed the policy. Conversations about ethics or standards are reportedly occurring at the administrative level, but the district has not communicated to administrators the expectation that they deliver this information to their staff members, nor has it provided district staff with any formal ethics training. Many district staff members were confused about the topic of ethics and what that term meant. Some continued to believe that the SafeSchools Training modules completed included ethics; however, no such module was offered.

Improving the ethical culture of an organization takes time and considerable effort. At the district, the process has been aided by the state administrator and district staff have a much more positive attitude than during the previous review period. District administrators consistently reported attending administrative meetings to keep abreast of events at the district. The state administrator has also worked to provide the community with information about the district, including attending a community change luncheon in December 2012. Despite these efforts, however, a great deal of work remains. Improving

the district's ethics will require additional time, a consistent message, and visible consequences.

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 were adopted December 12, 2012; Exhibit 4119.21, Professional Standards Code of Ethics, was adopted on September 8, 2010; and Exhibit 4219.21, Professional Standards, was adopted on April 20, 2011. In each new teacher packet, the district includes two paragraphs consisting of three sentences regarding its code of ethics. No copy of district Exhibit 4119.21 is included in the new employee packet for certificated employees, and there is no indication that the employee is required to acknowledge receipt, review the policy, or 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 or training was 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 that 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.

During the fourth comprehensive review period, the district changed its means for reporting questionable activities from an internal hotline via the district's main telephone number to a hotline associated with WeTip, Inc., a separate entity that provides for anonymous reporting of criminal activity. The district has displayed posters from WeTip on its campuses, and flyers are available at school site administrative offices. Information is also prominently displayed on the district website's home page. Although most employees were aware of the WeTip hotline, some were unsure what could be reported. When WeTip receives a tip, WeTip determines where to report the information. For example, theft 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, because the WeTip posters and flyers do not mention fraud or ethics violations, there is confusion regarding what is reportable. 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 factors 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 but has decreased with new funding from the Local Control Funding

Formula (LCFF). However, many district employees continue to experience reductions in employee compensation and benefits. The third factor, rationalization or lack of integrity, was reportedly prevalent in prior review periods. Although the perception of a double standard was not raised during this review, the district should not relax its vigilance on this issue because the inclination to right a previous wrong can be a part of the rationalization for unethical or fraudulent behavior. The remaining factor, opportunity, varies depending on an employee's assigned duties. Audit findings in the district's 2008-09, 2009-10, 2010-11, 2011-12 and 2012-13 audited financial statements identified various potential opportunities for fraud. Some of these were also provided in the 2007-08 audit and repeated in 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. The state administrator continues to revise existing and adopt new board policies. Board members and district administrators reported, and board agendas show, that each regular board meeting agenda normally includes board policies for either a first or second reading. The district contracts with the California School Boards Association (CSBA) for updates to its board policies and administrative regulations through its Gamut online product. This service issues periodic updates to policies and administrative regulations, and board members, district administrators and staff reported that the district is now reviewing the last update packet from CSBA and there is no longer a backlog. District administrators reported that they receive copies of policies that concern their departments or area of expertise, recommend changes to reflect district practice, and see those changes incorporated into the policies being reviewed in board agendas.
5. Filing the California Fair Political Practices Commission's statement of economic interests (Form 700) is required at various times coinciding with events in the educational agency. Most often these are to be filed each calendar year; however, they are also required within 30 days of assuming or leaving office and within 30 days of the effective date of a newly adopted or amended conflict-of-interest code. Three events warranted the filing of Form 700s during this review period: annual filings for 2012, due on April 2, 2013; the election of a new board member and departure of a board member in 2012; and the departure of the CBO and hiring of a business manager in 2013. The district is allowed to file statements that combine assumption and departure from office and the annual deadline; however, this must be specified.

Government Code section 87302 and Board Policy 9270 require the district to designate positions that are required to disclose their financial interests. The following are the district's designated positions pursuant to Board Policy 9270, adopted October 21, 2011:

- Governing board members
- Superintendent of schools/state administrator
- Chief business official
- Assistant/associate superintendent
- Fiscal services manager

- Director
- Principal
- Assistant principal
- Student services coordinator

FCMAT's review of Form 700 filings provided by the district and the list of designated positions shows the following:

- For the 2012 annual filings with a filing deadline of April 2, 2013:
 - The state administrator, chief business official (CBO) and four of the five trustees completed the annual form prior to the April 3, 2013 deadline. However,
 - The departing board member could have combined their departing statement with their annual statement but did not clearly specify this by checking the appropriate boxes in section three. Consequently, there is no departing statement for this board member.
 - FCMAT was unable to obtain the annual filing for one trustee.
 - The fiscal services manager, directors, principals, and assistant principals did not complete annual forms prior to the April 3, 2013 deadline.
- For those who assumed office in 2012:
 - The board member who assumed office on December 11, 2012 did not file either a combining assumption/annual statement due on April 2, 2013 or an assumption statement due by January 11, 2013.
 - The new business manager and assistant superintendent, administrative services did not file assumption statements in 2013.
- The departing CBO, fiscal services manager, special education director and director, education services did not file Forms 700 in 2013.

The California Fair Political Practices Commission has no provisions for extending filing deadlines and imposes fines and penalties on those who miss them. The commission may impose individual late filing penalties of \$10 per day, up to a maximum of \$100, as well as a fine of up to \$5,000 per violation. However, if errors or omissions are discovered on any statement, the amendment schedules may be completed and filed as soon as the error or omission is discovered.

6. In the district's audited financial statements for the fiscal years ending June 30, 2009, June 30, 2010, June 30, 2011, June 30, 2012 and June 30, 2013, the auditor's opinion included a paragraph regarding the district's ability to continue as a going concern and 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 this information.
3. Continue to inform employees, students, community members and board members of the district's WeTip hotline, including what types of items can be reported, 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. Continue to include the senior manager or administrator from each applicable district department in the process when adopting or revising board policy.
6. Continue to file statements of economic interest for individuals who have vacated or assumed seats on its board or as key officers of the district.
7. Carefully examine all statements of economic interest to ensure that they contain complete disclosures.
8. 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

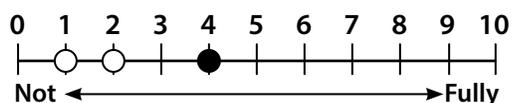
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 2

June 2014 Rating: 4

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

Although the district had updated its organizational chart, some employees remained confused about their supervisor and employee relationships. In approximately six months, the district's business office had experienced the departure of an interim CBO, the hiring and resignation of a permanent CBO, and return of the interim CBO. The department had only 2.6 full-time equivalent (FTE) staff members, which made it difficult to segregate duties; there were significant audit findings regarding this for fiscal year 2010-11.

Summary of Fifth Comprehensive Review, June 2014

The district continues to update its organizational chart as changes occur, and almost all employees cited supervisors who matched what is depicted on the chart. A permanent, full-time business manager has been hired, and the district reported plans to hire a permanent payroll/benefits technician. However, during the current review period, the business office operated with only 2.6 full-time-equivalent positions (FTE), and as a result continued to experience challenges in internal controls; this was reflected in the district's audited financial statements.

Findings

1. The district provided FCMAT with an organizational chart dated December 4, 2013 that identifies all management and district support staff positions, their reporting structure, and lines of reporting and support. The majority of district staff understood who their supervisor was, and their understanding agreed with the organizational chart.
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 permanently filled its payroll/benefits technician position and has continued to assign the maintenance, operations, transportation, and facilities (MOTF) technician position to the MOTF department two days per week and to the district office as a business technician three days per week. The district plans to immediately fill the payroll/benefits technician position; however, that plan was not implemented at the time of FCMAT's fieldwork.

The business manager and the business technician continue to be responsible for most business department duties. This has resulted in a lack of segregation of duties. This issue was included as a finding in the district's 2011-12, 2010-11, 2009-2010, 2008-2009 and 2007-2008 audited financial statements (findings 2012-10, 2011-14, 2010-3, 2010-5, 2009-3, 2009-5, 2008-3, and 2008-5). The district's audited financial statements for 2012-13 did not contain a finding in this area.

The concern over the lack of proper segregation of duties is exacerbated by the fact that the business department has had significant turnover and has been restructured four times in four 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 associated student body (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. This change increased the number of day-to-day business functions at a time when the business department had only two employees. Internal controls were also compromised because these two employees were processing the transactions and entering them into the accounting records. School sites also reported difficulties processing their transactions because of inadequate information regarding the ASB accounts. Duties related to ASB funds were transferred back to the school sites effective July 1, 2013 with the district office providing ASB training and oversight for internal control purposes.

Recommendations for Recovery

The district should:

1. Increase its efforts to immediately fill and expand positions in the business department.
2. Provide newly hired business services department staff with intensive training to ensure the continuity of institutional knowledge regarding the district's finances. This training should be provided by current staff if possible, but the district may need to call upon the Monterey County Office of Education or other professionals for assistance if its own staff are no longer available.
3. Continue to provide annual training to the school site personnel, advisors and administrators who have responsibility for ASB funds.

Standard Partially Implemented

February 2010 Initial Rating: 3

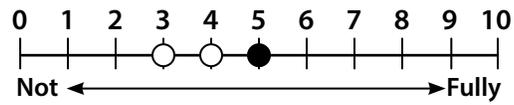
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Site and department staff had good working relationships with the business department, and the department provided timely information. However, site and department staff needed more training in business procedures and budget functions, and all department managers needed to have online access to the district's financial management system (FMS). An executive cabinet was formed and met weekly. The district had not shared its 2010-11 audit findings with staff members or developed desk manuals for business office positions.

Summary of Fifth Comprehensive Review, June 2014

School site and department staff continue to have good working relationships with the business department. The district implemented the Escape financial software system during this review period. Site and department staff need additional training in business procedures, budget functions and Escape, and all department managers need to have online access to Escape. The district had not yet shared its 2012-13 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 still need additional training in these areas. Several staff members are relatively new to their positions and need additional verbal and written training in budget development and monitoring, account coding and business procedures; others need additional training in the Escape financial software system to be able to review budgets and run financial reports.
2. The district has an executive cabinet that meets weekly. Members include the state administrator, business manager, assistant superintendent, human resources administrator, and the executive assistant to the state administrator. These meetings provide an opportunity for participants to discuss issues and to ensure that decisions made by the state administrator have been communicated to staff members responsible for their implementation.

The district also has a cabinet that meets every other week. Cabinet members include the executive cabinet and department managers. In addition, the administrative council

meets every two weeks. Members include the executive cabinet, department managers as needed, and school principals. Items such as business processes and procedures and collective bargaining agreements are discussed at these meetings.

3. The state administrator has continued to post monthly to his blog, providing information about some of the district's issues and board actions. Employees are informed by email when a new blog post is created.
4. The audit report for fiscal year 2011-12 was conducted by the California State Controller's Office and included 25 findings. There were 19 audit findings from the fiscal year 2010-11 report for which the recommendations remained either unimplemented or partially implemented. The district's fiscal year 2012-13 audit was conducted by Christy White Associates and included 10 audit findings, one of which was classified as a material weakness. There were seven audit findings from the fiscal year 2011-12 report for which the recommendations remained unimplemented. The decrease in audit findings for 2012-13 was significant.

Staff indicated that the 2012-13 audit findings had not been shared with applicable staff members because the district had not yet presented the audit to the board of trustees. It is a best practice to share annual audit findings as soon as the audit is received to help ensure that procedures are corrected and staff are held accountable for following them.

5. School sites have online access to the district's Escape financial software system and can review account line budgets and print financial reports; however, not all department managers have this access, and some school site staff need additional training. 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.
6. 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.

Recommendations for Recovery

The district should:

1. Provide ongoing verbal and written training to site and department staff regarding budget development and monitoring, account coding, proper business procedures, and the use of Escape.
2. Provide formal written communication, and continue to provide verbal communication, 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 so that it is easier for individuals to locate and access.
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 Escape so that they may review their budgets and run financial reports.
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

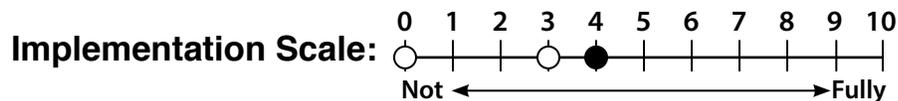
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 4



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.

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 it was recommended that this employee continue providing board members with budget training. The state administrator had begun providing draft board policies and administrative regulations to administrators and managers for review before placing the documents on the board agenda.

Summary of Fifth Comprehensive Review, June 2014

Purchase orders are not included on board agendas for approval or ratification. The monthly cash flow reports provided to the board include actuals to date but do not include projections for the remaining months of the fiscal year. The district conducted two board study sessions regarding the district's budget and financial issues; study sessions such as these should continue to be provided and be scheduled at times when a majority of the board can attend.

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. Beginning with the September 12, 2013 board meeting, warrant reports were presented for approval; the district should present purchase orders and contracts for approval on each regular board meeting agenda.
2. An Escape fund balance summary report and a cash flow summary report are included as information items on the board agenda every month, except in months that include a state-required budget report. As of the September 12, 2013 board meeting, the cash flow report includes actuals to date, but it does not include projections for the remaining months of the fiscal year.
3. At each state-required budget reporting period the business manager provides the board with a budget presentation that includes a narrative executive summary with a budget overview and multiyear financial projection assumptions. However, the board is not receiving information regarding year-to-year budget trends; charts and graphs portraying the trends; or a simplified and more user-friendly budget summary spreadsheet showing budget information by resource and program.

4. At a board study session on December 5, 2012, the state administrator and former CBO provided information regarding district finances and negotiations. Two board members attended the meeting. The agenda for this meeting was not posted on the district's website.
5. At a board study session on March 27, 2013, the state administrator and former CBO provided information regarding the new state funding formula. Four board members attended the meeting.
6. Board members indicated that they feel confident with the information provided regarding the district's finances and have benefited from continued training regarding the district's budget.
7. The district continues to develop and/or update several board policies and administrative regulations, including those regarding business and noninstructional operations. Draft policies and regulations are provided to the appropriate administrator or manager for review before being included on the board agenda.

Recommendations for Recovery

The district should:

1. Ensure that each regular board meeting agenda includes the approval of purchase orders and contracts by the state administrator.
2. Ensure that the cash flow reports submitted to the board include actuals to date and projections for the remaining months in the fiscal year.
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. Continue to schedule board training sessions regarding the district's budget to improve board members' understanding of the budget and of public education finance. Ensure that meetings are scheduled so that a majority of the board members can attend.
5. Post all board agendas on its website.

6. Continue to ensure that the board takes an active role in understanding the district's financial position.
7. Continue to provide 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

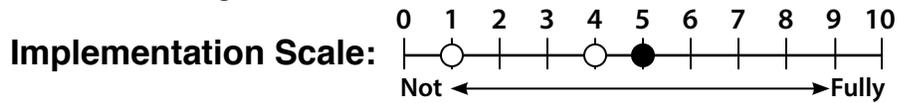
February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5



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.

Summary of Fourth Comprehensive Review, March 2013

The business department consisted of a chief business official, a fiscal services manager, and a part-time business office technician. The district had not developed and implemented a professional development plan for business department employees or ensured that each employee received timely evaluations.

Summary of Fifth Comprehensive Review, June 2014

The business department consists of a business manager, a payroll/benefits technician, and a business technician/MOTF support employee who works part-time in the business office. The district transitioned to the Escape financial software system and staff attended numerous Escape training sessions provided by the county office. However, the district has not created or implemented a professional development plan for business department employees.

Findings

1. The district has changed the business department's staffing structure four times in the last four years. The organizational chart dated December 4, 2013 includes 2.6 FTE business department positions: a business manager, a payroll/benefits technician, and a business technician/MOTF support employee who spends three days per week in the business office. At the time of FCMAT's fieldwork, the payroll/benefits technician position was vacant; the individual recently hired to fill the position had not yet started.
2. The district transitioned to the countywide Escape financial software system during this review period, and staff members attended numerous Escape training sessions provided by the county office.
3. The district does not have a formal professional development plan for its business department positions. The district needs to assess the experience and expertise of each business department staff member and implement a professional development plan for each individual. It is best practice to ensure that such a plan includes workshops, inservice 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.

Recommendations for Recovery

The district should:

1. Consider increasing the business technician position to full time.
2. Assess the experience and expertise of each business department staff member, and develop and implement a professional development plan for each individual. Use a standard form to document each plan, and review the plans at least annually.

Standard Partially Implemented

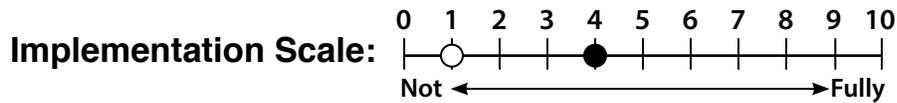
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The district had not developed a professional development plan for training site and department staff members about business topics. Some staff members continued 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 continued to be hampered by minimal staffing in the business department.

Summary of Fifth Comprehensive Review, June 2014

The district has not created a professional development plan for training school site and department staff members in business topics. The district provided ASB and Escape training to some employees during this review period, but some staff members continue to indicate a need and a desire for additional training. Progress in this area continues to be hampered by minimal staffing and high staff turnover 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 procedures, budget development and monitoring, account coding, and the Escape financial software system.
2. During this review period, the business department provided ASB training to school site staff and, in cooperation with the information technology director, provided Escape training to school site and department staff. 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 lacks 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 ongoing training regarding business procedures, budget development and monitoring, account coding, and the Escape software to school site and department staff members who work in these areas.
2. Provide school site and department staff with annual training that includes information regarding business-related processes, procedures and forms.
3. Create, 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

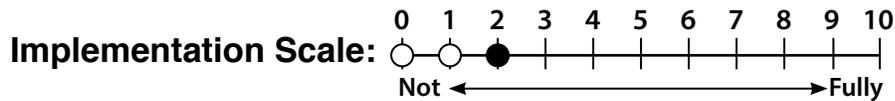
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 2



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to provide monthly budget and cash flow reports to the board, but these had recently returned to including actuals only rather than both actuals and projections. Multiple board members had 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 indicated that unless it eliminated deficit spending there was a probability that it would need an additional loan.

Summary of Fifth Comprehensive Review, June 2014

Although the district continues to provide monthly budget and cash flow reports to the board, their contents have changed with the conversion in accounting software. The new revenue reports are shorter than in the past, and the cash flow reports no longer include projections for the remainder of the year. The business department and other departments continue to provide board study sessions. Although the district has reduced expenditures during the past two fiscal years and anticipates an increase in revenues because of the state's new funding formula, it has not eliminated deficit spending. The district's calculation of its reserves now includes monies in fund 17; however, some of those funds are reserved and should be omitted from the calculation to avoid double counting.

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, the district continues to present a monthly budget report to the board. This document was generated from the Financial Management System (FMS) through June 30, 2013 and from Escape thereafter. The FMS reports showed the approved budget, working budget, amounts expended during the month and year to date, encumbrances, and unencumbered balance based on major object code. The Escape report is a one-page document showing the budget, amounts expended year to date, encumbrances, unencumbered balance, and percentage available based on groupings of object codes.
 - Except in months when other financial information is presented, such as interim reports or unaudited actuals, the district continues to present a monthly cash flow report 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, and the projected amounts to year end, which provided the board and the community with the district's cash flow expectations and allowed them to see the full impact of budget decisions. With the change to the Escape software system, effective with the September 12, 2013 report, all funds have cash flow reports presented; however, they do not include projected amounts to year end.

- The district's state administrator and its former CBO conducted a board study session on district finance and negotiations on December 5, 2012.
 - On March 27, 2013, the state administrator conducted a board study session on the new funding formula and review of the district's communications plan.
 - On February 27 and April 24, 2013, a teacher and the state administrator, respectively, conducted board study sessions regarding the Common Core standards.
 - Two board governance workshops were provided through CSBA on January 21 and 22, 2014.
 - One board member graduated from CSBA's Masters in Governance program, bringing the board's total graduates to two. One of the remaining four board members needs to complete one module of this training; one needs to complete two modules; one needs to schedule two modules; and the newest board member is just beginning to schedule and complete modules.
2. Improvement continues in attempts to broaden the board's general understanding of the budget and to provide 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. However, with the recent change in funding to the LCFF, the board, school sites, departments and the community will need additional training. At each financial reporting period the district continues to provide an executive summary that includes 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 (see also analysis of accuracy of the executive summary below and at Standard 5.4). However, additional information such as charts, graphs and an analysis of the variance between the prior report and the one being presented would 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 from previous fiscal years (such as changes in the SACS criteria and standards reports). This highlights the need for continuity in administrative personnel and 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 district's 2011-12 unaudited actuals to the 2012-13 unaudited actuals for the general fund reveals the following:
 - A decrease of \$204,000 in total revenues, primarily because of decreases in federal revenues
 - A decrease of \$1,012,000 in expenditures for salaries and benefits
 - An increase of \$381,000 in services and other operating expenditures
 - A decrease of \$1,710,000 in transfers into the general fund
4. A comparison of the 2012-13 unaudited actuals to the 2013-14 1st interim report for the general fund shows the following:
 - An increase of \$1,846,000 in total revenues, primarily due to the change from revenue limit funding to the LCFF
 - A decrease of \$201,000 in expenditures for salaries and benefits
 - A decrease of \$266,000 in expenditures for books and supplies
 - An increase of \$1,293,000 in services and other operating expenditures
 - An increase of \$64,000 in capital outlay expenditures
 - An increase of \$323,000 in contributions to restricted programs

Even though there have been large decreases in expenditures in the prior two fiscal years, and although a large increase in revenue is anticipated for the current year, deficit spending has not been eliminated despite the fact that the district's 2013-14 first interim report's executive summary states "the district no longer has a structural budget deficit." The multiyear projections from that same document show that the district continues to project deficit spending of \$629,441.42, \$420,982.90, and \$293,900.85 in fiscal years 2013-14, 2014-15 and 2015-16, respectively.

In addition, the district has fully drawn down all of the funds from the state loan. Of those funds, \$2,985,000 was placed into the special reserve fund for other than capital outlay projects (fund 17), and \$1,249,000 was placed in the debt service fund (fund 56). Monies in fund 17 were earmarked to pay for state audit findings, which currently total \$1,424,851 (see chart in Standard 10.4); however, during the 2012-13 audit, the auditors moved these funds into the general fund through a fund balance transfer. The auditors made no adjustments to the funds held in the debt service fund.

The calculation of the district's reserves in its 2013-14 first interim budget relies on including all the monies held in fund 17. However, by including all of these funds in this calculation the district is counting them twice: once for payment of the audit findings and a second time in the calculation of the reserve. A more accurate calculation would subtract the amount needed for the audit findings (\$1,424,851) from the fund 17 balance (\$2,985,000), leaving \$1,560,149 available to include in the general fund reserve calculation. Applying this formula would reduce the general fund reserves reported in the 2103-14 first interim report from 23.47% to 15.76% for 2013-14, from 23.17% to 15.07% for 2014-15, and from 21.26% to 13.27% for 2015-16. As noted above, the auditors moved the \$2.985 million from fund 17 to the general fund. If the district wishes to keep

these funds earmarked for payment of the audit findings, the funds should be transferred to a committed fund balance account within the general fund so that they remain separate from the remainder of the reserves and cannot be spent on anything other than the audit findings. The remainder of the general fund reserves should be treated as one-time funds and, as such, used judiciously and only for one-time expenditures.

The district has concluded its collective bargaining with both bargaining units for both 2012-13 and 2013-14. Negotiations have yet to commence for the 2014-15 school year, and neither side has sunshined (that is, made public) their proposals. The collective bargaining agreement with certificated staff expires on June 30, 2014, at which time all provisions of the agreement are subject to revision. The agreement with classified employees expires on June 30, 2016 but allows for reopeners on salary, health and welfare and two other articles for the 2014-15 and 2015-16 school years.

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. To assist them in this, 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; review of the district's most recent board agenda reflects that monthly study sessions are planned.

Recommendations for Recovery

The district should:

1. Provide the board with more detailed monthly revenue and expenditure reports.
2. Provide the board with monthly cash flow reports that contain projections through year end.
3. 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.
4. Encourage board members to complete the CSBA's Masters in Governance training.
5. Provide training to the board, sites, departments and the community regarding LCFF.
6. 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.
7. Continue to review the budget to identify revenue increases or additional expenditure reductions to eliminate ongoing deficit spending.
8. Transfer the \$1,424,851 earmarked for audit findings into a committed fund balance account within the general fund.

- Continue to provide supplemental trainings from district staff members to ensure that the board can effectively apply concepts learned to local issues and circumstances that focus on students' and the district's needs.

Standard Partially Implemented

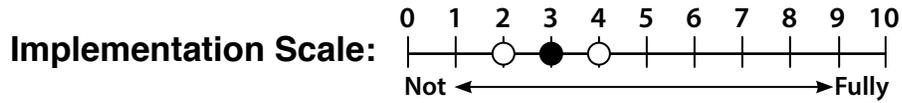
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 3



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to obtain little input from sites, departments or the board in developing the 2012-13 budget, and the audited financial reports continued to include a finding regarding the district's ability to continue as a going concern. The district had two additional meetings of its budget advisory committee; however, attendance declined: its last meeting included only the state administrator, the CBO and a library clerk.

Summary of Fifth Comprehensive Review, June 2014

There was no input from the board, site or department administrators, or the community during development of the 2013-14 budget. Although the district's budget advisory committee has a membership roster, there were no meetings during this review period.

Findings

1. Staff reported that the district's 2013-14 budget was developed primarily by the former CBO and the current business manager. As in the past, involvement of school site and department managers was minimal. However, interviews indicated that the new business manager intends to increase school site and department participation in budget development for fiscal year 2014-15. This has been the intent of the various CBOs and business managers the district has employed during the last four review periods, but has not yet been accomplished. If this goal can be reached and the new business manager enlists the participation of school 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 or the 2013-14 budget, and allocations were not presented to them. Although it is not known whether board input is planned for 2014-15 budget development, the district had begun to include community members and district administrators in budget development through its budget advisory committee; however, those efforts have stalled.
3. The district's audited financial statements for the fiscal years ending June 30, 2012 and June 30, 2013 continue to include a finding regarding the district's ability to continue as a going concern. These findings are numbered 2012-01 and 2013-13, respectively, and they repeat 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

fiscal 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, had two additional meetings during the fourth review period, and has held no further meetings during the fifth review period. The 2013-14 budget committee is composed of one student, one teacher, one parent, one classified employee, and three district administrators including the state administrator and the business manager.

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 2014-15. 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 (that is, positions for which an employee completes a time sheet showing hours worked) 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 codes and how the 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 during budget development.
 - Information regarding indirect costs, including what they are, how they are calculated, and the need 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 regularly and tries to include a broader spectrum of community interests including, but not limited to, representatives from the board, district administrators, school administrators, district departments, employee bargaining units, parents, students, and the non-parent community.

Standard Partially Implemented

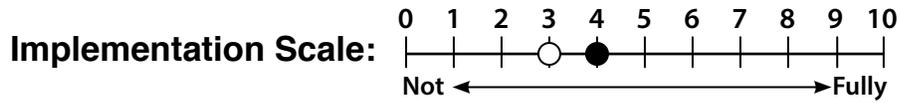
February 2010 Initial Rating: 3

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The board continued to be uninvolved in developing the district's budget but had been provided one study session regarding budget and fiscal matters. Carryover continued to be excluded from the budget until it was quantified, and the application of the district's indirect cost rate continued to need further attention as did its marked decrease between 2011-12 and 2012-13.

Summary of Fifth Comprehensive Review, June 2014

The board was not involved in the development of the 2013-14 budget, and no budget priorities were identified for the budget development. The district has consistently included carryover only when it has been quantified. However, some investigation is required regarding the increase that will occur in its indirect cost rate from 2013-14 to 2014-15, and the district's budget calendar continues to need revision to reflect the deadlines associated with the process.

Findings

1. The district continued to provide training to the board in budget and fiscal matters, including conducting a study session on December 5, 2012 regarding district finances and another study session on March 27, 2013 regarding the state's new funding formula. The most recent board agenda shows an additional study session to be held on March 19, 2014 regarding budgets, how to read them, and the Local Control and Accountability Plan (LCAP). However, the district did not involve the board in developing the 2013-14 budget. With the recent change in the business manager position, it is not known how the board will be involved in developing the 2014-15 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 budget development for fiscal year 2013-14. Although each board item contains a cover sheet with goals, including "develop/sustain fiscal crisis long-term solution," there is no evidence that the district has developed or used any list of priorities for budget resource allocations and expenditure reductions for its 2013-14 budget.
2. Carryover continues to be incorporated into the budget at preparation of the first interim report, which is in alignment with standard practice. Industry best practice is to include carryover in the budget only after it has been definitively quantified, which occurs upon completion of the unaudited actuals but before the first interim report is issued.

3. 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 restricted programs. This form indicates that the district's approved individual indirect cost rate was 4.10% for fiscal year 2012-13. The indirect rates used in programs varied from 1.44% to 4.10%. The allowable rates vary among 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 2013-14 is 3.56%, which is a 13% decrease from the prior fiscal year. Its preliminary proposed indirect cost rate as calculated in the 2012-13 unaudited actuals is 10.12%, or an increase of 184%. Charging each restricted program the appropriate indirect cost rate helps the unrestricted portion 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 2012-13 estimated actuals revealed that a categorical program, Title III, included an indirect rate lower than that allowed by law. The district's account summary balance reports for fiscal year 2013-14 indicate that the budgets for some categorical programs do not include indirect costs, while others include rates that are lower than or higher than those allowed by law.
4. The district's budget calendar continues to include 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 fourth 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, including the deadlines for making the proposed budget available for public inspection and for presenting the budget to the board. These have become even more complicated with the change to the LCFE and the need to include public hearings for both the budget and the LCAP. The budget calendar needs to include all of the applicable tasks and the dates 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 increase in the preliminary indirect cost rate for fiscal year 2014-15.
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

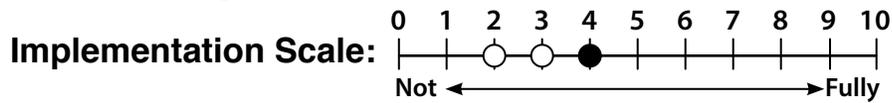
February 2010 Initial Rating: 2

March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The district 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 was no use of staffing formulas or budget allocations to departments. Budget worksheets were not used to communicate funding allocations, and the district's budget remained unbalanced.

Summary of Fifth Comprehensive Review, June 2014

The district's 2013-14 budget rolled over from the prior year. Consequently, no priorities, staffing formulas, or allocation formulas were used in its creation. Close review of the district's most recent budget document, the 2013-14 first interim report, shows that numbers were inconsistent with what was reported by outside sources such as CDE and School Services of California, Inc. and between the information in the SACS forms and in the executive summary attached to the report.

Findings

1. On October 9, 2013, the district revised BP 3100, setting forth policies and regulations for its budget and budget development processes. A review of revised BP 3100 shows that it has now been changed to correctly include the district's practice of an annual single budget adoption process. The revision to this policy marks the first time since its adoption on March 9, 2011 and revision on January 1, 2012 that the policy matches the district's practice. District staff indicated that department staff are now included in board policy review and that they see their suggested revisions as board policies and administrative regulations are taken to the board for adoption.
2. Department managers and school site administrators indicated that they had not been involved in the development of their budgets for 2013-14 and that the budget was a rollover from the prior year's budget. No worksheets were provided to school sites, departments or school site councils to give them information regarding how their budgets were calculated.

Although school sites have been given a discretionary budget from lottery funds based on average daily attendance (ADA), they were not given allocation formulas; the school sites control how those dollars are budgeted and expended. Other revenue sources are allocated to school sites; however, because school 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 showing funding allocation formulas.

3. The district's most recent budget document is its 2013-14 first interim report. The multiyear financial projection (MYFP) contained therein shows that the district moved from the revenue limit calculation for state revenue to the new LCFF calculation. However, the MYFP's assumptions were minimal and did not include items such as the following:
 - ADA used in projecting LCFF funding
 - Socioeconomic factors used in calculating the supplemental and concentration grant funding
 - Gap funding percentages used in LCFF calculations
 - Causes for reductions in federal funding in subsequent years
 - Reasons for increases in local funding and contributions from unrestricted resources in subsequent years
 - Staffing changes from budget adoption in the current year and between subsequent years
 - Effect of the Affordable Care Act on employee benefit expenditures
 - The rationale for percentage increases in various other expenditure categories
4. District staff provided their LCFF calculations used to develop the 2013-14 first interim report using SSC's LCFF simulator; however, they did not use revenue worksheets to develop the 2013-14 first interim report's other revenues, but provided a copy of their account summary reports for 2013-14, dated January 31, 2014, showing the revised budget. Applying SSC's Governor's Budget Dartboard and information posted by the California Department of Education (CDE) when the first interim report was being developed revealed some deviations, including the following:
 - Lottery – unrestricted is calculated by using the prior year's annual ADA, multiplying that by an absence factor of 1.04446, then multiplying that result by the estimated funding amount per ADA. Performing this calculation results in estimated revenues of \$241,991 for 2013-14; however, the district's first interim report shows a budget of \$227,044.
 - Notes on budget updates show that the district was planning to "add more classified to balance the resource" for special education, Individuals with Disabilities Education Act (IDEA) basic local assistance funding. When transferring expenditures from other resources into those supported by federal dollars, care is needed to avoid violating the rules requiring that federal funds supplement, not supplant, other funding. To appropriately perform such a transfer, the amounts transferred can only be associated with 50% of any new federal revenues received.
 - The Title III, Immigrant program is budgeted at \$7,978, but information posted by the CDE at the time of budget development indicates an entitlement of \$5,133. According to the 2012-13 Form CAT, the carryover for this program was \$4,359, which would result in a total budget of \$9,492.

- The Title III, Limited English Proficiency (LEP) program is budgeted at \$67,642, but information posted by the CDE at the time of budget development indicates a preliminary entitlement of \$50,579. According to the 2012-13 Form CAT, the carryover for this program was \$37,531, which would result in a total budget of \$88,110.
- Lottery – restricted is calculated by using the prior year’s annual ADA, multiplying that by an absence factor of 1.04446, then multiplying that result by the estimated funding amount per ADA. Performing this calculation results in estimated revenues of \$57,617 for 2013-14; however, the first interim report includes a budget of \$65,250.
- Mandated cost reimbursements were budgeted at \$-0- but information available from SSC’s governor’s budget workshop indicates that proposed funding was \$56 per prior year P-2 ADA, or \$104,154.
- Various items of other local revenues were budgeted at \$-0- but had posted revenues of \$191,698.
- The LCFF simulator uses the district’s 2012-13 revenue as the minimum state aid to determine its 2013-14 funding; however, a review of the calculation revealed the following:
 - The amount of total revenue limit funding used (\$11,143,503) did not match the amounts shown in the 2012-13 Form RL and the general ledger (\$11,162,162). Further review of Form RL, the P-2 attendance report, Form A, and the general ledger found the following:
 - The amount for ADA in Form RL did not agree with the Form A ADA, and ADA was over-reported by 1.34 in Form RL.
 - Minor adjustments to items such as property taxes and community redevelopment funds were needed to balance them with those shown in the general ledger.
 - After application of the above items, the 2012-13 revenue limit funding was \$11,154,072, which means that it was overstated by \$8,090 in Form RL and in the general ledger.
 - Comparison of the recalculated amount and that used in the LCFF calculation shows that the LCFF calculation amount was understated by \$10,569.
 - The amount of state categorical funding used in the district’s LCFF calculation did not match the amounts that SSC automatically generates in its simulator or the amounts in the district’s 2012-13 general ledger or entitlements as reported by CDE. The following chart shows the various numbers that are available for use in the LCFF calculation:

South Monterey County Joint Union High School District LCFF – State Categorical Programs, 2012-13

Program	Amounts Reported By				
	Pre-Flexibility Resource	SSC LCFF Calculator	SMCJUHS LCFF Calculator	SMCJUHS Gen. Ledger	Entitlement Per CDE
Undistributed Amount	Various	\$1,897,577	\$2,556,015		
Administrator Training Program	7325			\$7,274	\$7,274
Adult Education	6390			\$306,841	\$295,914
Arts and Music Block Grant	6760			\$33,190	\$33,190
California High School Exit Exam Intensive Instruction	7055			\$120,057	\$116,576
Class Size Reduction Grade 9	1200			\$93,779	\$93,779
Community Based English Tutoring	6285			\$21,108	\$21,108
Deferred Maintenance	6205			\$81,365	\$81,365
Economic Impact Aid (EIA)	7090	\$307,573		\$345,035	\$307,573
Gifted and Talented Education	7140			\$14,714	\$15,164
Instructional Materials Fund Realignment Program	7156			\$120,666	\$120,666
Math & Reading Professional Development	7294			\$4,009	\$4,009
Math & Reading Professional Development English Learners	7296			\$1,002	\$1,002
Middle & High School Counseling	7080			\$124,118	\$124,118
Peer Assistance & Review	7271			\$6,325	\$6,325
Professional Development Block Grant	7393			\$45,691	\$45,691
Pupil Retention Block Grant	7390			\$276,789	\$276,789
Home-To- School Transportation	7230	\$289,367	\$288,977	\$289,367	\$289,367
Regional Occupational Centers/Programs	6350			\$340,966	\$441,085
School & Library Improvement Block Grant	7395			\$1,404	\$1,404
School Safety Block Grant	6405			\$108,554	\$108,554
Supplemental Instruction Hourly Programs	0000			\$85,088	\$140,894
Targeted Instructional Improvement Block Grant	7394	\$40,125		\$40,125	\$40,125
TOTAL		\$2,534,642	\$2,844,992	\$2,467,467	\$2,571,972

- Amount is reported by the California State Allocation Board

^ - Funds flow through MCOE to district; using 2012-13 general ledger as no other documentation available.

FCMAT followed the district’s choice to use the SSC LCFF simulator, changed the revenue limit funding as noted above, and used the categorical funding as reported by the CDE in the above chart. This produced a 2013-14 LCFF amount of \$14,547,824. The district’s revised budget at first interim reported LCFF amount of \$14,497,081, underreporting by \$50,743; however, the executive summary and calculation sheets provided by district staff showed an LCFF amount of \$14,793,981.

5. The executive summary of the district’s 2013-14 first interim report also contained various inaccuracies, including the following:

- The amount reported as the total 2013-14 LCFF funding (\$14,793,981) did not match what was reported in the SACS forms (\$14,497,081).
- The general fund 2013-14 beginning fund balance was reported incorrectly.
- The increase in projected general fund expenditures was overstated and did not match the 2012-13 unaudited actuals.
- The summary stated, “the district no longer has a structural budget deficit” but the multiyear projection clearly shows a net decrease in fund balance for all three years.
- The funds held in fund 17 are being used both as part of the calculation of reserves in the multi-year projection and as a source of funding for the payment of audit findings (see also Standard 5.1).

6. A comparison of the 2011-12 and 2012-13 forms CAT revealed the following:

- Some ending balances or carryover amounts in the 2011-12 Form CAT were not the same as the beginning balances in the 2012-13 Form CAT, which can cause confusion about which numbers are correct. Examples include special education IDEA basic, Title II – Part A, State Financial Stabilization Fund (SFSF), Restricted Lottery, special education IDEA – state funding, economic impact aid (EIA), and other local accounts.
- Several resources had been completely used; however, the carryover amounts or fund balances for the following programs increased from 2011-12 to 2012-13:

Carl Perkins Vocational Program increased by \$4,555

Title III, Immigrant increased by \$4,359

Title III Limited English Proficiency (LEP) increased by \$37,531

EIA increased by \$179,478

Home-to-school transportation increased by \$16,217

- In addition, the accounts payable testing performed in Standard 10.5 noted that the district returned \$17,354 of unexpended funds from 2010-11 Title III LEP funds during the 2012-13 fiscal year.

1. The district’s human resources and business services departments’ staff indicated that staffing formulas are not being used, other than the 35-to-1 student-to-teacher ratio in the collective bargaining agreement with certificated employees. Little input regarding staffing was sought from principals or department managers during budget development.

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 included.

2. Ensure that it includes school sites and departments in budget development for fiscal year 2014-15.
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 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 an LCFE calculator or simulator, SSC's Dartboard, and Dynamic Budget Guide software.
7. Ensure that the ending fund balances and carryover amounts on the prior year's Form CAT are the same as the corresponding beginning balances 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. 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

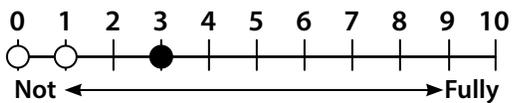
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 0

June 2014 Rating: 3

Implementation Scale:



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))

Summary of Fourth Comprehensive Review, March 2013

For the third consecutive year, the district delivered its budget prior to the July 1 statutory deadline, and it was drafting a five-year fiscal recovery plan.

Summary of Fifth Comprehensive Review, June 2014

This review period marks the fourth consecutive year that the district has delivered its budget to the county office of education prior to the July 1 statutory deadline.

Findings

1. The board held a public hearing and the state administrator adopted the district's 2013-14 budget at a special board meeting on June 25, 2013, within the statutory timelines established by California Education Code (EC) section 42103. On October 3, 2013, county office of education staff recommended that the state superintendent of public instruction approve the budget. County office staff indicated that their office received the 2013-14 budget before the July 1 deadline required by EC 42127. The October 3 letter indicated the county's concern regarding the district's ability to meet its financial obligations in 2014-15 and 2015-16 without additional budget solutions, based on negative unrestricted general fund ending fund balances in those years and ongoing unrestricted deficit spending. The passage of Assembly Bill 97 on July 1, 2013 established a historic shift in school funding to the LCFF. The LCFF replaced revenue limits and most state categorical program funding with base pupil grants by grade span and supplemental and concentration grants determined by the number of students who are English learners, foster youth, or eligible for free and reduced-price meals.
2. The county's October 3, 2013 letter acknowledged that the district's 2013-14 budget was prepared prior to the passage of AB 97 and did not include assumptions based on the LCFF, which might result in increased funding. The letter recognized the district for its efforts in developing a budget and financial plan for its ongoing fiscal stability. However, the county office's budget review letter included the following comments and recommendations:
 - The district would be able to meet its financial obligations in 2013-14; 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 2013-14, 2014-15 and 2015-16 and have a negative fund balance in the two subsequent years.
 - The district has approximately \$4 million in reserves and is trying to minimize their use; however, it may not be able to meet its financial obligations in the subsequent years without use of these funds if further expenditure reductions are not realized.
 - Negotiations for 2013-14 have been finalized; the net effect will be ongoing savings to the district.
 - 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.
3. This is the fourth 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 3, 2013 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.
 4. 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. The district's board meeting minutes for April 10, 2013 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. With the passage of AB 97 and implementation of the LCFF, programs categorized as Tier III under SBX3 that have been granted flexibility funding since 2008-09 are eliminated, as are program requirements; these are now combined with the minimum state aid in calculating the LCFF. Tier III public hearings previously required under SBX3 are no longer required beginning in 2013-14.
 5. With implementation of the LCFF, the California Education Code has also been revised to include sections 52060-52077 regarding the adoption of the LCAP on or before July 1, 2014 and its relationship to a district's budget. The LCAP is to be revised annually and include listings and descriptions of expenditures made in implementing the LCAP. Public hearings regarding the LCAP and budget are to be held at the same board meeting (section 52062(b) (1)); however, the LCAP and budget are to be formally adopted at a single meeting separate from these public hearings (section 52062(b) (2)).

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, in compliance with EC 42127(d).
3. Ensure that the public hearings required by EC 52062 for the LCAP and budget are held prior to and independent of the annual adoption of the LCAP and budget.

Standard Fully Implemented

February 2010 Initial Rating: 2

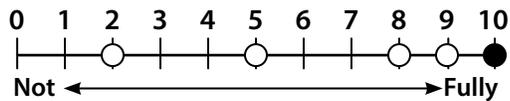
March 2011 Rating: 5

March 2012 Rating: 8

March 2013 Rating: 9

June 2014 Rating: 10

Implementation Scale:



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))

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.

Summary of Fifth Comprehensive Review, June 2014

For the third consecutive year, the state had an on-time budget. On June 27, 2013, Governor Jerry Brown signed the 2013-14 State Budget Act, which required districts to make budget revisions available to the public before August 11, 2013. Unfortunately, the district was three days late in presenting its updated budget to the state administrator and the board.

Finding

1. On June 27, 2013 Governor Brown signed Assembly Bill 110, the 2013-14 State Budget Act, giving the state three consecutive years of on-time budgets. As a result, districts were required to make available to the public information regarding changes to budgets as a result of the 2013-14 State Budget Act on or before August 11, 2013. District staff provided FCMAT with the district's August 14, 2013 board agenda item detailing the revisions made to its budget due to the governor's signing of the 2013-14 State Budget Act and the passage of AB 97, which enacted the LCFF. Minutes of the meeting confirm that these revisions were presented to the board and that the board discussed this item. Although the district complied with providing a budget update, it occurred three days after the deadline imposed by EC 42127(i)(4).

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 in accordance with the statutory deadline.

Standard Partially Implemented

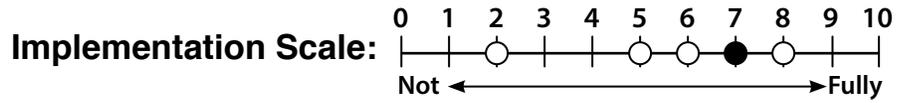
February 2010 Initial Rating: 2

March 2011 Rating: 6

March 2012 Rating: 8

March 2013 Rating: 5

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

This review period marked the third year that the district was able to meet the reporting deadlines for its interim financial reports. The district and county office continued 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 continued to express concerns regarding the minimal oversight provided by the county office and the CDE.

Summary of Fifth Comprehensive Review, June 2014

As with the submittal of its budget to the county office by its deadline, this marks the fourth consecutive year that the district has met its deadlines regarding its interim reports. The county continues to express its concerns about the district's deficit spending; however, the county office did not issue a review letter regarding the district's 2012-13 third interim report. The concern regarding the county's and the CDE's minimal oversight continues.

Findings

1. The county office's review letter for the district's 2013-14 first interim budget report was dated February 21, 2014 and acknowledges the timely submission of the report to the county office. 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 11, 2013 governing board meeting minutes indicate approval of the first interim report, and the meeting date complies with EC 42130.

The 2013-14 first interim budget review letter from the county office indicated that the district's budget included a positive certification and that the county office agreed with that assessment. The letter commented on this being the first time since 2007-08 that the district has filed a positive interim report and congratulated the "District State Administrator, Board of Trustees, Administration and Staff for the hard work and diligence in making the decisions necessary to bring the district back from fiscal insolvency." The letter also points out projections for unrestricted general fund deficit spending in 2014-15 and 2015-16 as well as the inclusion of fund 17 for a calculation showing that the available reserves equal 23.47% of the annual unrestricted general fund budget expenditures.

The multiyear projections show a dramatic increase in available reserves from the 2012-13 interim reports to the 2013-14 first interim report. Although the LCFF increased revenues and reduced deficit spending, the primary cause of the reserve increase was the fact that the 2013-14 first interim report included the reserve for economic uncertainties within fund 17 while the 2012-13 interim reports categorized fund 17's ending balance in accounts that were not available for inclusion in the multiyear projections. Had fund 17's entire ending balance been included in the 2012-13 interim reports as shown in the 2013-14 first interim report, available reserves would have changed as shown in the following table:

Available Reserves

	As Reported			Inclusion of Fund 17		
	2012-13	2013-14	2014-15	2012-13	2013-14	2014-15
1st Interim	3.33%	-4.64%	-12.15%	28.07%	20.06%	12.56%
2nd Interim	2.41%	-6.48%	-15.08%	26.81%	18.09%	9.39%
3rd Interim	4.11%	-4.70%	-13.03%	27.95%	19.86%	11.31%

2. The district and county office personnel still do not meet regularly. The fact that the county office did not issue a letter regarding the district's third interim budget report is a concern, particularly given 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 the inclusion of fund 17 in multiyear projections to provide consistency across reporting periods.
3. Hold regular meetings with both the county office of education and the CDE.

Standard Partially Implemented

February 2010 Initial Rating: 3

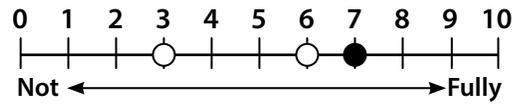
March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 7

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to make little progress in this standard. Although staff reported that they were more comfortable using the FMS system to submit online requisitions and run reports, the Monterey County Office of Education, which provides the software, was scheduled to change to the Escape system. This was expected to result in sites and departments directing more requests and questions to the business office.

Summary of Fifth Comprehensive Review, June 2014

The county office converted from the Financial Management System (FMS) software to Escape financial software effective July 1, 2013. The purchase requisition system contains a hard stop, which prevents a purchase from progressing past the requisition stage without a budget transfer. District personnel have received initial training on the new Escape system, but most are requesting additional and ongoing training in both purchasing and budget monitoring to increase their ability to run reports in the system.

Findings

1. The county office converted from FMS to the Escape financial software system on July 1, 2013. This has presented the district with the challenge of retraining all of its online users as well as fielding questions as they arise regarding the new software.
2. Escape'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 had received initial training in Escape to process purchase requisitions; however, most expressed a desire for more in-depth training. Questions from staff are directed to the business manager or the business services technician. The business technician is assigned to the business services department three days each week and to the maintenance and operations department two days a week. 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.

3. The majority of district staff and administrators indicated that they have access to the Escape system and are able to view accounts and print reports, but a few are either unaware that they have access or unsure of that access. With the implementation of

Escape, many administrators were unsure how to generate reports even if they knew they had access to them. If assistance is needed with viewing accounts or printing reports, they can call or email the business manager or the business technician, who either guide them through the process or print the items needed and forward them to the requestor. 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.

4. The online purchase requisition system will not allow a purchase that exceeds the line item budget, so the business office staff no longer have to monitor account line balances before placing orders. However, the business manager continues to be the only individual who gathers the information and prepares and enters all budget transfers into Escape. In many school districts, school site or department staff initiate budget transfers before they are carried out in the business office.
5. District staff continue to present the board with a monthly budget update; however, these reports have changed with the conversion in financial software. The reports generated from the FMS software included balances for revenues and expenditures by major object code. The new reports from Escape are much shorter, showing revenues and expenditures by group. For example, the reports show all certificated salaries on one line rather than 13 lines as the FMS software did. Staff members also present interim budget reports to the board as required by the Education Code; these reports include multiyear budget projections.
6. 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. Site councils at both comprehensive high schools reported that they did not receive their budgets until the fall, and only one received an updated budget that included carryover from Title I. Neither had a clear understanding of which programs provided funding to their schools, and both expressed a desire for more training in understanding revenue sources and appropriate expenditures from each source. The business office continues to act as the final approver for categorical spending; however, school 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 Escape online purchase requisition system and account coding.
2. Provide staff with additional training in Escape to advance their proficiency in viewing accounts and running reports.

3. 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 Escape.
4. Continue to present monthly budget reports to the governing board; however, expand them to provide more detail.
5. Provide school site staff and school site councils 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

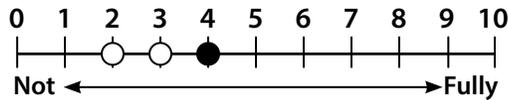
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to be hampered in improving its rating for this standard because of the difficulties of the FMS position control system. However, the county office was implementing the Escape financial software system, which has a fully integrated position control module. Full implementation was anticipated on July 1, 2013.

Summary of Fifth Comprehensive Review, June 2014

The district saw a large improvement in position control with the county's conversion from FMS to Escape. The Escape software has an integrated position control module that drives and encumbers payroll. The ability to access and use the position control system has eliminated the need to compare information and eliminate discrepancies between human resources and business services departments' information. Even with the new and improved system, however, work remains to complete the module to ensure that all items attached to salaries and benefits are included.

Findings

1. Because of the difficulties with FMS, the district used its position control module only to maintain employee demographics. The county office acknowledged the difficulty of readily using this module and began countywide implementation of the Escape financial software system, which includes a position control module. Full implementation of Escape occurred on July 1, 2013. The Escape software has a fully integrated position control module, and its position control module drives payroll. The module also encumbers payroll using the end-of-month payroll information, extrapolating it to an annual amount, and updating that calculation at the end of each payroll cycle. District office personnel in both human resources and business services completed data entry into the Escape position control module, were able to take it live on July 1, 2013, and used it to issue payroll on its regular cycle in July with minimal errors. The Escape system's position control module frees the district of dependence on Excel spreadsheets to perform position control functions. This has also eliminated the need to periodically compare and match information held in each department to minimize discrepancies.

Although the position control module is now an integral part of the hiring, budget and payroll processes, it continues to need adjustments, and this will be the case throughout the life of the system.

Review of the salary projection by account report, staffing report by account, add-on earnings by account report, and interviews with district staff show that amounts for the following have been incorporated into the position control system:

- Longevity
- Vacation payouts
- Assigned stipends
- Educational stipends
- Cell phone allowances
- Mileage stipends

However, items that have not yet been incorporated into the system but are being tracked by other means, such as spreadsheets or manual calculations, include the following:

- Health and welfare payments made to retirees
- Substitute pay
- Overtime
- Extra duty pay
- Unassigned stipends

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 system prevents a district from omitting from the budget routine annual expenses such as substitutes, extra duty pay, overtime pay, stipends, and health and welfare payments made to retirees.

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. Unilateral personnel decisions made by school site and department administrators can have significant impact on both position control and the district's budget. The district continues to direct and inform employees 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 site administrators' understanding of their role in the employment process, have eliminated hiring outside of the normal personnel procedures. In prior years, exceptions to the normal hiring process reportedly occurred for positions in the athletic program.
4. In addition to requiring the position requisition and employee change of information 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.
 - 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.
 - The district requires that each employee pick up his or her paycheck or pay stub and sign a receipt for it.

These procedures have enabled staff to readily detect payroll errors and have enabled funds to be returned to the district. During the fourth comprehensive review, failure to reconcile payroll to the prior month resulted in 12 employees receiving overpayments totaling \$24,933. Although the error was detected and payroll corrected, \$600 in overpayments remained to be returned to the district. Despite requests to determine the

status of the overpayments for this review, FCMAT was unable to obtain confirmation that those funds have been repaid in full. No further instances of overpayment occurred during the fifth review period.

Recommendations for Recovery

The district should:

1. Ensure that the position control module includes all contracted positions as well as routine annual expenses such as health and welfare payments for retirees, substitutes, extra duty pay, stipends, and overtime pay.
2. Update position control as changes are made to ensure that all revisions are captured in a timely manner.
3. Continue the directive that requires the state administrator's approval before hiring, and hold every employee accountable for following the directive.
4. Continue to require personnel requisitions and personnel action forms for all hiring and position changes.
5. Continue using internal control procedures to detect fictitious employees or nonemployees and to protect against over- or under-payment of payroll.

Standard Partially Implemented

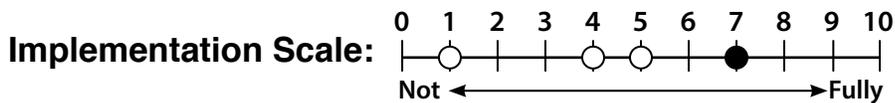
February 2010 Initial Rating: 1

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

Board members were provided with a cash flow statement containing the actual year-to-date and projected balances each month. A fiscal recovery plan needed to be implemented to minimize future cash flow deficiencies and draws from the state loan. The district was not reconciling its cash balances in FMS to the cash in the county treasury or the revolving cash fund monthly.

Summary of Fifth Comprehensive Review, June 2014

The cash flow summary reports provided to the board include actuals to date but do not include projected monthly balances. The district continues to work to minimize cash flow deficiencies and use of the remaining state loan proceeds. Procedures need to be implemented to ensure that a reconciliation form for each bank account is completed, signed and dated monthly; ensure that the same employee is not responsible for both reconciling the bank statements to the account balances and preparing the checks written on the account; and to avoid overdraft fees.

Findings

1. District staff and board agendas indicate that the board is provided with a cash flow report at each regular monthly board meeting, either as a separate report or with interim reports. The 2013-14 adoption budget did not include cash flow projections.

The statements provided through June 2013 include the actual year-to-date and projected ending cash balances for each month. However, the monthly cash flow summary reports provided after that time, except for the 2013-14 first interim report, include actuals to date but not projected 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 has drawn the entire loan, and based on the 2013-14 first interim report, the remaining proceeds have been deposited and accounted for as follows: \$2,985,159 in Fund 17, Special Reserve Fund for Other than Capital Outlay Projects; and \$1,248,728 in Fund 52, Debt Service Fund.

The district's 2013-14 first interim report cash flow projections indicate that the district will not draw from fund 17 in fiscal year 2013-14. This projection includes the following conditions for 2013-14:

- July 1, 2013 beginning cash balance of \$192,857.
- June 30, 2014 ending cash balance of \$415,339.

Staff indicated that some of the remaining emergency loan funds may be needed for payments because of audit findings.

3. The county office reconciles the countywide district fund in the county treasury to the records of the auditor-controller monthly. Information is not provided to the district regarding the monthly reconciliation.
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. During this review period, the district opened a clearing account in which funds from collection of items such as retiree benefits and developer fees are deposited and then cleared by transferring funds to the county treasury. The district also opened a cafeteria account to be used for deposits of cafeteria collections and then cleared by transferring funds to the county treasury.

The business manager is responsible for reconciling the three accounts each month and for preparing checks from the RCF. The documents provided for the clearing and cafeteria accounts for October, November and December 2013 did not include a monthly bank reconciliation form indicating that the bank statement balanced to the account register.

Recommendations for Recovery

The district should:

1. 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. Continue to implement a plan to minimize future cash flow deficiencies and use of the state loan proceeds.
3. Request that the county office provide the district with its monthly reconciliation of cash in the county treasury.
4. Complete a reconciliation form for each bank account monthly, and ensure that the reconciliations are signed and dated by the employee responsible for this duty.
5. To provide for proper internal controls, ensure that the same employee is not responsible for both reconciling the bank statements to the account balances and preparing the checks written on the account.
6. Implement procedures to avoid overdraft fees.

Standard Partially Implemented

February 2010 Initial Rating: 1

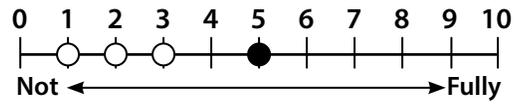
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The interim CBO continued to be the only district employee with the training and experience needed to process payroll. The CBO was also responsible for 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 Fifth Comprehensive Review, June 2014

The business manager is the only district employee trained to process payroll. The business manager is also responsible for signing the preliminary payroll list, and has access to the pay warrants once they are received from the county office. The district has reorganized the business department to include a payroll/benefits technician, and the individual hired to fill the position was scheduled to start the week after FCMAT's fieldwork.

Findings

1. The district processes two payrolls each month: an end-of-month payroll for regular salaried positions and a supplemental payroll for substitutes, extra duty, 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. However, if a payroll error is made the district typically waits until the next payroll cycle to correct the error.

Education Code Section 45167 provides direction regarding payroll errors that are the fault of the district and requires those types of errors to be corrected within five workdays.

2. The business manager is responsible for processing each payroll and for preparing and signing the preliminary payroll list submitted to the Monterey County Office of Education. The county office then produces the payroll warrants and sends them to the district office. The business manager prints the payroll distribution lists and separates the warrants by site. The warrants are then delivered to sites and departments. Staff indicated that employees are required to sign the distribution list to obtain their payroll warrant, and any remaining warrants are brought back to the district office and mailed. The business manager also prepares payroll vendor warrants for mailing to vendors.

The business manager is the only district employee who has the training needed to process payroll. Proper internal controls would ensure that the employee responsible for processing payroll is not also responsible for reviewing and signing the preliminary payroll list and does not have access to the warrants received from the county office.

The district has reorganized the business department to include a payroll/benefits technician position. Staff indicated that an individual has been hired to fill the position and was to start the week following FCMAT's fieldwork. The business manager, a fiscal consultant, and the county office will help train the new technician, and staff indicated that duties will be properly separated once the individual is trained.

3. The district uses a monthly payroll reconciliation spreadsheet to balance the month-end payroll and has developed a reconciliation spreadsheet for the supplemental payroll to help ensure that mistakes are detected before payroll is finalized. In addition, the human resources department continues to provide the business office with a personnel action form for all payroll changes.

The business manager completes payroll reconciliations for each payroll. Staff indicated that there were a few payroll errors when Escape was implemented, but those have been corrected. For example, deductions were taken from pay warrants for insurance but the insurance company was not paid on time.

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 the district continues to work to reduce reporting errors. The county office continues to express concern that the district does not have adequate staffing for payroll and retirement functions.

Recommendations for Recovery

The district should:

1. Ensure that payroll errors are corrected in a timely manner, in compliance with Education Code Section 45167.
2. Immediately train a district employee other than the business manager to process payroll.
3. 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.
4. 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.
5. Continue to use the payroll reconciliation spreadsheet for each pay cycle and the personnel action form.

1. Ensure that the payroll reconciliation spreadsheets 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

June 2014 Rating: 4

Implementation Scale:

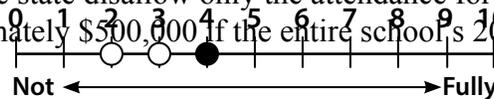
9.2 Attendance Accounting

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.

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 was 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 had implemented a credit recovery program to help students complete graduation requirements. However, not all stakeholders were included in the process. Although students were taking additional course work, the attendance system was not set up to accept grades for multiple courses in a single class period, and data had to be corrected to show students' grades and course credits.

Summary of Fifth Comprehensive Review, June 2014

Both high schools have implemented a previous recommendation to run daily attendance reports, which are used to verify the accuracy of the attendance and then make corrections. The district restructured several positions at the district level, including the truancy specialist position, to provide more direct support at the school sites. The attendance clerk at each site prepares and sends the first and second truancy letters to parents; the school site counselor sends the final truancy letter. Normally, the Aeries student information system has the capability to produce the letters, but this feature is not functioning so the letters are produced manually.

Previous recommendations for the district to provide cross-training on the California Longitudinal Pupil Achievement Data System (CALPADS) 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 data system analyst. The Aeries student information system has been reconfigured to allow counselors to enter classes into Odysseyware (a classroom credit recovery and advancement software program) for teachers. Once the classes are entered, teachers can assign multiple grades to students in multiple classes for credit recovery.

Findings

1. Average daily attendance (ADA) generates the majority of the district's funding. Effective July 1, 2013, the new Local Control Funding Formula (LCFF) provides additional funding to local education agencies for students classified as English learners or low income (EL/LI) reported through the CALPADS student information system based on the district's unique unduplicated pupil count. The unduplicated pupil count provides additional LCFF funding for students that qualify as English learners, foster youth and students that qualify for free or reduced priced meals. 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 data system analyst 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. According to district procedures, school site attendance clerks are trained to generate certain reports daily, weekly and monthly to test the accuracy of data input at the site level and to identify unexcused absences and possible truant students:

Weekly Attendance Report: Generates a list of students by class or by teacher. This reports shows the student attendance for the week.

Attendance Audit listing: To ensure accuracy of enrolled students on attendance and student screen. Also identifies students with missing codes for absences.

ABI Report: Identifies individual teacher attendance submitted early.

Missing ABI Report: Indicates any teachers who have not submitted attendance for each of their assigned periods.

Unverified Absences: Lists unverified absences by student. Another report shows students with more than a certain number of absences.

Gain and Loss Report: To validate the list of students who entered and exited a school or special program, or changed teachers, track or grade.

Monthly Attendance Report: This is the final verification of student absence activity and average daily attendance as a percentage of total enrollment.

Period Absence Audit: Run daily and requires a teacher's signature for verification. Prints a list of students who were not marked absent from classes on a specific date.

Attendance Audit Listing: Includes students who do not have a valid leave code. This report is used for internal audits.

3. At the district level, the data system analyst 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. The information technology director prints Aeries system audit reports and reviews the final reports for accuracy and testing for reasonableness.

The district has hired a consultant who provides immediate support and ongoing Aeries and CALPADS training. The data system analyst and information technology director attend regular trainings hosted by Aeries as well as trainings offered at the county office of education.

Both comprehensive high schools have implemented a previous recommendation for school sites to run daily attendance reports. These reports are used to verify the accuracy of the attendance and then make corrections as needed. The district restructured several positions at the district level to provide more direct support at the school sites. The truancy specialist position was included in this reorganization. The attendance clerk at each site is responsible for first and second truancy letters to parents, and the school site counselor sends the final truancy letter. Normally, the Aeries student information system can produce the letters, but because this part of the software is not functioning the truancy letters are processed manually.

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. Weekly reports are reviewed to ensure that they have valid teacher signatures. This is a new procedure following audit findings in the state controller's audit report for 2010-11 that jeopardized approximately \$500,000 in funding. The district is working on an appeal to reduce the loss, which will not be eliminated completely.

4. Both comprehensive high schools have sufficient supporting documents to verify absences but lack procedures to notify parents regarding truant students (this will be discussed in depth in Standard 9.6). School site personnel work closely with the district's data system analyst and school site counselors. 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.
5. The Aeries support team, composed of district-level support staff and school site personnel, meets regularly throughout the school year. Mandatory attendance training for school site personnel is provided before the start of the school year. Mandatory annual training gives staff the opportunity to clarify procedures and ensures that any new laws and/or regulations are communicated in a timely manner. Aeries support meetings occurred on March 6, 2013, April 10, 2013, November 25, 2013 and January 29, 2014. The district has scheduled meetings monthly through the end of the current fiscal year.

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. Site administrators have instructed support staff to review signed attendance reports to verify the teachers' signatures at all school sites. During the period of this review, the school counselor provided teacher training at Greenfield High School. King City High School needs to provide the same training to teachers. Staff report isolated instances of noncompliance, which are immediately reported to the principal for corrective action.

6. The district implemented Odysseyware, a classroom software program to manage credit recovery and credit advancement, to serve students who need credits to graduate and to reduce ADA losses caused by absences. This program can determine a student's proficiency level and create a curriculum designed for the individual student's pace. Bridgewater, Odysseyware's technology-driven curriculum, 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. The district uses this program for Saturday school and during class periods identified in the master schedule.

The Aeries student information system has been reconfigured to allow counselors to enter the Odysseyware classes for teachers. Once the classes are entered, teachers can assign multiple grades to students in multiple classes for credit recovery. Individual courses for each credit recovery class have been established in Aeries. These are then reported 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.

7. 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 before they are submitted to the state and after they are reviewed by both the business manager and information technology director. The data system analyst ensures timely submission of student data exported from Aeries to CALPADS in accordance with the Fall 1, Fall 2 and end of year reporting schedules.
8. Previous recommendations for the district to provide cross-training on the CALPADS system have been partially implemented. The district needs to establish a cross-training schedule to ensure that essential functions can be maintained in the absence of the data system analyst. District staffs have used the self-paced CALPADS online training provided online by California School Information Services (CSIS) as well as the Aeries Yahoo group and Aeries.net.

Recommendations for Recovery

The district should:

1. Continue providing 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. Include new attendance accounting procedures or changes in state regulations.
2. Provide training to all teachers on the importance of completing accurate attendance records, and hold them accountable to Education Code and CCR requirements.
3. Ensure that site administrators or their designees review signed attendance reports to verify the signature of the teacher.
4. Ensure that there is adequate cross-training for CALPADS reporting.
5. Require staff to use the online CALPADS training provided by CSIS.

Standard Partially Implemented

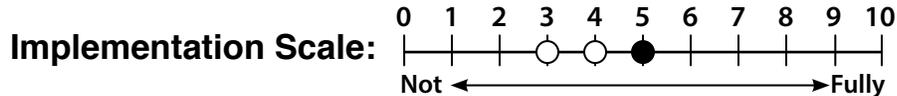
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5



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.

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 had not been implemented. The district needed to use the Aeries student information system to record attendance for all programs, and conduct internal attendance audits throughout the fiscal year.

Summary of Fifth Comprehensive Review, June 2014

The district has complied with previous recommendations to ensure that all independent study attendance is processed electronically using the Aeries system.

The district has not provided documentation to indicate that it has addressed a previous recommendation to conduct internal audits. These audits test the validity of the independent study attendance reported for apportionment purposes. The district is encouraged to conduct internal audits for independent study attendance accounting and provide school site staff with annual attendance training regarding independent study.

Findings

1. The district has adopted and revised Board Policy and Administrative Regulation 5117, Interdistrict Attendance, on February 11, 2013.
2. The district offers students independent study 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.
4. Independent study attendance is processed electronically using the Aeries system.
5. The district has not provided documentation to indicate that it has addressed a previous recommendations to conduct internal audits. These audits test the validity of the independent study attendance reported for apportionment purposes. The district is encouraged to conduct internal audits for independent study attendance accounting and provide school site staff with annual attendance training regarding independent study.

Recommendations for Recovery

The district should:

1. Perform periodic internal audit procedures to test the validity of attendance reported for apportionment purposes.
2. Provide mandatory annual attendance training regarding independent study.

Standard Partially Implemented

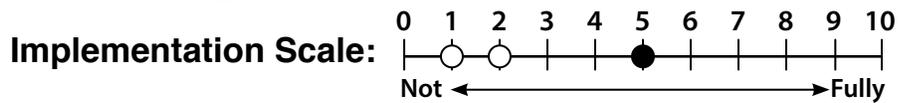
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 2

June 2014 Rating: 5



9.4 Attendance Accounting

Professional Standard

Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.

Summary of Fourth Comprehensive Review, March 2013

The district provided annual training to all staff involved with attendance recording and reporting. Annual training needed to be mandatory, and additional training needed 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.

Summary of Fifth Comprehensive Review, June 2014

Each school has one attendance clerk. During this review period, the district restructured district-level truancy and associated student body (ASB) responsibilities to the school sites and combined these functions with attendance reporting. Although all of these functions are essential, the attendance and truancy functions affect the majority of the district's funding, which is based on attendance reporting. The district needs to monitor how this new structure is working during the transition year and make adjustments as needed to ensure consistent, accurate and timely attendance reporting and truancy monitoring.

Findings

1. The district has provided sufficient resources and training for school site staff on attendance reporting. Manuals prepared by the Aeries support team provide step-by-step instructions on how to enter student attendance information into the Aeries software. The manual includes detailed instructions for daily, weekly and monthly attendance reporting. Each school has one attendance clerk.
2. During this review period, the district restructured district-level truancy and ASB responsibilities to the school sites and combined these functions with attendance reporting. Although all of these functions are essential, the attendance and truancy functions affect the majority of district funding, which is based on attendance reporting. The district will need to monitor how this new structure is working during the transition year and make adjustments as needed to ensure consistent, accurate and timely attendance reporting and truancy monitoring.
3. 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.

4. The attendance clerks at each comprehensive school site compile 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. School site counselors are responsible for sending the third and final letter of truancy to parents. The district held a meeting with parents on January 16, 2014 to discuss the ramifications of chronic truant students and the parents'/ guardians' responsibility to ensure that their student attends school.

Recommendations for Recovery

The district should:

1. Continue providing training opportunities for employees.
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. Monitor the effectiveness of the new structure under which school sites are responsible for ASB and truancy functions during the transition year, and make adjustments as needed to ensure consistent, accurate and timely attendance reporting and truancy monitoring.

Standard Partially Implemented

February 2010 Initial Rating: 3

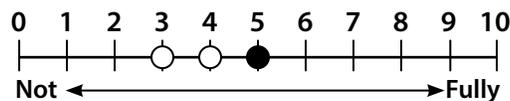
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district did a superior job of monitoring truant students and working with the local district attorney's office to enforce compliance. There was a large difference in truancy rates between the two comprehensive high schools. The district needed to examine the underlying reasons for this variance and develop a plan to correct it. The Saturday school program provided an opportunity for students to make up attendance and for the district to receive additional apportionment. School administrators needed to enforce Saturday school attendance and follow up to ensure that students have fulfilled their referral obligations.

Summary of Fifth Comprehensive Review, June 2014

The district restructured key positions at the district level that were responsible for truancy and coupled this duty with the ASB and registrar duties at the school sites. Previous systems that were highly effective in reducing truancy and increasing attendance rates are not the highest priority for these positions. The drop of more than 2% in ADA as a percentage of enrollment at both comprehensive high schools is significant and could be the result of combining the truancy position with other school site duties.

Findings

1. 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.

2. 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 notified parents as required. 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.

3. 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.

4. The district tracks individual student trancies and monitors each student throughout the school year. The first letter of truancy is denoted as T1 in the Aeries system. Students who continue to be truant receive the second letter, referred to as T2. 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. Instead of individual truancy conferences with the parent and student, the district held an attendance/truancy meeting with parents on January 16, 2014. Information regarding students on warning lists did not indicate whether staff actually made contact with parents or guardians, nor was there any documentation to support the communication.

Prior to this review period, the truancy specialist provided, via the Aeries system, detailed information on the number of students who were issued letters T1, T2 and T3 at both sites and documentation to support the communication with parents/guardians. In addition, the FCMAT study team was given a complete list of chronic truants who were referred to the district attorney's office. This information was not provided for the current review.

5. The district places a high priority on student attendance, and provides annual and monthly trainings as discussed in other sections of this report. However, during this review period the district restructured key positions at the district office in an attempt to provide more direct support services at the school sites. Specifically, the truancy specialist and the registrar positions were combined with the ASB duties and responsibilities effective July 1, 2013.
6. As a result of these past efforts, both schools experienced a drop of approximately 80% in truancy during the 2011-12 school year between the three notification letters. This was a direct result of training and communication among the school sites, the truancy specialist and parents. The process now involves the school registrars who produce the first two letters to parents and school counselors who make the final notification. Because these staff members have many other duties and responsibilities, the truancy function is not their highest priority.

Truancy letters and any communication with parents or guardians needs to be documented in the student record on the Aeries system for future reference. These

notations include the date of communication, whom staff spoke to, and the substance of the conversation. An unsuccessful attempt to reach a parent or guardian should be followed up with a telephone call. The Aeries student information system can print the truancy letters, but this part of the program has not worked in many months. The information technology director is working to find a solution, but in the meantime the school registrars are producing these letters manually.

Recommendations 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 decline in ADA as a percentage of enrollment.
3. Provide training and procedures to the personnel who have truancy responsibilities.
4. Ensure that the truancy notification to parents is timely and fully documented in the Aeries system.
5. Find a way to prepare truancy letters using the Aeries software system.
6. Reevaluate the current staffing configuration for truancy duties.

Standard Partially Implemented

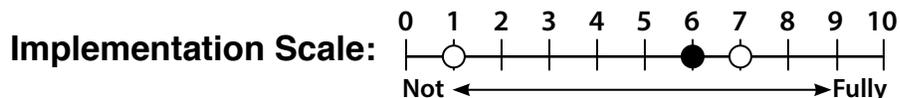
February 2010 Initial Rating: 1

March 2011 Rating: 6

March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

The district had adopted or revised several board policies and administrative regulations regarding student attendance that were expected to provide guidance to district staff, parents and students. The district implemented attendance training sessions but needed to include focused training using the online Eagle Software manual. The district had few district office personnel but nonetheless needed to provide cross-training in specialized tasks such as CALPADS reporting.

Summary of Fifth Comprehensive Review, June 2014

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.

Findings

1. The district has implemented mandatory training for all attendance personnel and monthly meetings with the Aeries support team designed to provide training, answer questions and share information. 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 district sent staff to the most recent Aeries annual conference. This event offers in-depth advanced training and updates on attendance reporting and new state regulations. The data system analyst and information technology director use online Aeries Yahoo and Aeries.net attendance training. The Aeries support team includes this training in regular training for school site personnel to ensure that school site staff achieve the highest level of accuracy with the student information system. The information technology director has created a monthly training schedule for all attendance staff and support staff members; this gives staff the opportunity to ask questions and exchange information on best practices.

2. 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.
3. 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. Attendance and audit reports

(identified in Standard 9.2) provide staff with the information necessary to give timely notification to teachers, administrators and parents when students are absent, tardy or truant.

4. Effective July 1, 2013, the new Local Control Funding Formula provides additional funding to local education agencies for students classified as English learners or low income (EL/LI) and reported through CALPADS. The number of unduplicated students meeting these classifications are entered into CALPADS, uploaded to the CSIS database, and ultimately reported to CDE for funding purposes. Accurate reporting from school sites to the district office for transmission to the CDE will require that district personnel with identifying and reporting functions receive adequate training in this process. Management will need to ensure that proper oversight and sufficient resources are available to support this endeavor.

The district has reported data to CSIS for the Fall 1 period for the 2013-14 school year. The official CALPADS report 1.17, FRPM/English Learner/Foster Youth – Count, shows an unduplicated student count of 1,581 and a total enrollment on information day of 1,962, which means that 80.6% (1,581 of 1,962) of the district’s total enrolled students are classified as EL/LI. This is an increase of 2.4% (1,541 of 1,971) compared to the Fall 1 report for 2012-13.

This percentage will be used for supplemental and concentration grant funding in addition to the base funding. Supplemental funding will yield 20% of the district’s base grant for the total percentage of EL/LI unduplicated students, and concentration funding will add 25.6% (80.6% - 55%) of the total enrollment, yielding another 50% of the base grant. This funding is intended, to increase or improve services to help EL/LI students achieve more educational success.

Recommendations for Recovery

The district should:

1. Conduct mandatory training sessions for all attendance personnel before the start of each school year.
2. Continue Aeries support team training monthly.
3. Ensure that employees responsible for CALPADS reporting receive training, and that management identifies resources to ensure that employees involved with the CALPADS identification and reporting functions have sufficient oversight and training.
4. Continue to ensure that district office and school site staff members responsible for student attendance accounting attend trainings provided by organizations such as Aeries as needed.
5. Ensure that school office personnel are cross-trained in attendance procedures.

Standard Partially Implemented

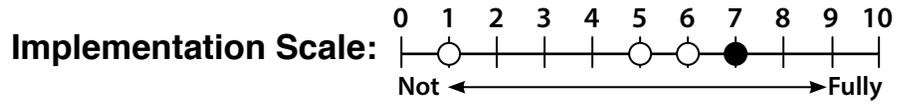
February 2010 Initial Rating: 1

March 2011 Rating: 5

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

The district's struggle to provide proper supervision of activities continued and was exacerbated by the turnover in the CBO position during this reporting period. The auditor's adjustments and findings increased significantly, and the district continued to file its audited financial statements after the December 15 deadline and present them to the board after the January 31 deadline.

Summary of Fifth Comprehensive Review, June 2014

The district made some progress in this area by permanently filling the business manager position. The business manager now reviews attendance reports before they are submitted to the state administrator and the state and no longer has to monitor the financial software for duplicate payments. However, overshadowing these gains are the consistent qualified opinions of the auditor, material weaknesses, and audit findings related to finance and noncompliance, which are material to the financial statements.

Findings

1. The business office was restructured during the past year and now includes a business manager, one payroll/benefits technician and one part-time business office technician. This reporting period has again seen changes in the CBO position. It started with the interim CBO who had been providing part-time services for many years but ended with the district hiring a full-time, permanent CBO who started in May 2013. The interim CBO has officially left the district as an employee but the district has retained this individual as an independent contractor for 500 hours of service during fiscal year 2013-14.

The business office restructuring was the fourth since 2009-10. The payroll/benefits technician position was vacant at the time of FCMAT's fieldwork. 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).

- Daily attendance reports are duplicated and provided to the data system analyst to ensure that attendance is reported each day.
- The state administrator and the business manager review 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 Escape software prohibits the posting of unbalanced journal entries.
- A hard stop feature in Escape prevents purchase orders from being issued if the budgeted balance is insufficient.
- Letters have been sent to all district vendors informing them that unless they possess a valid purchase order with either the state administrator's or the business manager's signature, the district will not be responsible for the goods ordered.

However, failure to follow all payroll procedures during the fourth reporting period led to some payroll over- and under-payments. As discussed in Standard 7.3, FCMAT was unable to determine if the remaining balances owed to the district as a result of overpayments had been eliminated as of the end of this reporting period.

2. Having 2.6 FTE positions in the business office has enabled the district to meet the majority of its financial statement deadlines. However, cross-training is still needed in numerous areas, including budget development and accounts payable.
3. Staff reported that FMS allowed duplicate payments of the same invoice because it failed to recognize duplicate invoice numbers. This internal control concern was reported to the Monterey County Office of Education, and the district was vigilant in manually overseeing the system to avoid overpayments. Because the new Escape software recognizes duplicate invoice numbers, the manual processes to avoid duplicate payments have been eliminated.
4. Staff reported that journal entries due to account coding errors are no longer a major issue. The main cause of journal entries during this reporting period was coding errors that occurred when salaries and benefits were incorrectly charged to programs. However, the district's lack of a review process for those journal entries was reported as finding 2013-07 in its June 30, 2013 audited financial statements.
5. The audited financial statements for the fiscal year ending June 30, 2012 included three adjustments: one to remove lawnmowers that were originally charged to the capital facilities fund (fund 25) and charge them to the general fund; one to properly accrue revenues in the general fund; and one to adjust accounts payable items that had not been properly accrued in the county facilities fund (fund 35).
6. The audited financial statements for the fiscal year ending June 30, 2013 included one adjustment to move funds from fund 17 to the general fund to comply with Governmental Accounting Standards Board (GASB) Statement No. 54. Although the findings in the 2012 and 2013 audited financial statements reflect a pattern of decreasing adjustments from five in the 2011 report to three in 2012 and one in 2013, the number and

nature of the audit findings in the 2012 audit report and continuing into the 2013 report causes concern regarding the district's ability to accurately record its financial activities. The 2012 audit findings included the following:

- Commingling ASB funds with other funds in the county treasury general fund account. This finding was not corrected and remained in the 2013 audit.
- Not performing cash reconciliations regularly. This finding was not corrected and remained in the 2013 audit.
- Revenue and accounts receivable reporting deficiencies: failing to record and accrue revenues, resulting in general fund revenues being understated by \$314,524.
- Failure to accrue year-end payroll expense of \$40,081.
- Accounts payable and expenditure reporting deficiencies: failing to record and accrue expenditures, resulting in a year-end accounts payable understatement of \$475,409.
- Capital lease not properly recorded.
- Long-term debt associated with compensated absences containing inaccurate pay rates. This finding remained in 2013.
- Conversion entries either entered incorrectly or not completely entered into the SACS accounting software.
- Refunding bond issuance was not recorded, causing long-term debt and expenditures to be understated by \$357,982.

7. 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 2009-10, 2010-11, 2011-12 and 2012-13 were December 13, 2010, February 23, 2012, May 8, 2013 and November 25, 2013, respectively. The completion of fieldwork for the 2011-12 audit was the latest 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 2009-10 audit report was presented on February 9, 2011, the 2010-11 audit report was presented on March 21, 2012, the 2011-12 audit report was presented on June 11, 2013 and the 2012-13 audit report was presented on February 12, 2014. In addition, FCMAT's review of the February 12, 2014 board packet showed that not all pages of the June 30, 2013 audited financial statement were included and presented to the board. The minutes from

the February 12, 2014 board meeting show that no comments were made about missing pages from the report, which is indicative of a lack of careful examination of the audit report.

Further inquiry regarding this issue revealed that the delays for the 2010-11 and 2011-12 reports were likely caused by the district's change in auditors to the state controller's office. Beginning with the 2012-13 audit, the district changed auditors again and the state controller's office is no longer responsible for the district's audits.

8. External, independent audit findings continue to identify internal control weaknesses and 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 information. Key information from the summary of auditors' results from the past four years is presented in the following table:

Summary of Key Audit Information, 2009-10 through 2012-13

Type of Auditor's Report Issued	2009-10 Qualified	2010-11 Qualified	2011-12 Qualified	2012-13 Qualified
Going Concern Finding	Yes	Yes	Yes	Yes
Material Weaknesses Identified	Yes	Yes	Yes	Yes
Significant Deficiencies Identified	Yes	Yes	Yes	Yes
Noncompliance Material to Financial Statements Noted	No	Yes	Yes	Yes
Total Number of Financial Audit Findings	8	14	16	7
Total Number of Federal Award Audit Findings	0	5	4	2
Amount of Federal Award Questioned Costs	\$-	\$639,629	\$21,601	\$13,667
Total Number of State Award Audit Findings	0	9	5	1
Amount of State Award Questioned Costs	\$-	\$631,788	\$118,166	\$-
Total Number of Audit Findings	8	28	25	10
Total Questioned Costs	\$-	\$1,271,417	\$139,767	\$13,667

The above table shows that the district has successfully reduced its audit findings from a high of 28 in 2010-11 to 10 in its last audit for the 2012-13 fiscal year. Although a decrease in audit findings indicates that the district's prior efforts have yielded results, the inability of the district's auditors to issue an unqualified report, and the findings of material weaknesses in internal controls and instances of noncompliance material to the financial statements, are of great concern.

9. The new Escape software is able to encumber payroll at the end of each month, and it adjusts the annual number based on the total for the period to date, extrapolating that into an annual amount. However, the system is not able to encumber overtime or extra time. Amounts associated with these items must be manually added as an extra line item.

Even with the added ability to encumber payroll, the district will continue to need to review its processes and procedures relative to the software to ensure that it has

incorporated an adequate level of control to prevent and detect errors and irregularities. Therefore, the hiring of permanent business office staff continues to be an important priority.

Recommendations for Recovery

The district should:

1. Consider making the part-time business technician position full-time and permanently filling the payroll/benefits technician position. This would provide three full-time positions in the business services office as shown on the district's organizational chart.
2. After filling the positions in the business office, review and revise procedures to increase separation of duties and oversight.
3. Ensure that staff are cross-trained in key functions including budget development, payroll and accounts payable.
4. Monitor the auditors' completion of the fiscal year 2013-14 annual audit to encourage compliance with EC 41020 and 41020.3.
5. Review and revise policies, procedures and internal control measures to address audit findings.

Standard Partially Implemented

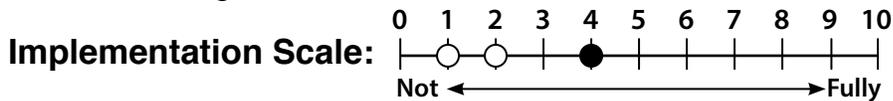
February 2010 Initial Rating: 2

March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 1

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued 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 had engaged an outside vendor to remedy this problem. Although the district believed that no goods were being delivered to employees' residences, the fiscal year 2010-11 audit included a finding indicating that this practice continued. In addition, the district did not provide 19 of the 20 accounts payable packets FCMAT requested for testing; the one provided contained two anomalies.

Summary of Fifth Comprehensive Review, June 2014

The district took back the duties of equipment inventory from its vendor and was completing its inventory report at the time of fieldwork. Staff continue to report that all purchases require a purchase order; however, 10 of the 20 accounts payable packets tested did not contain purchase orders.

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 years 2010-11, 2011-12 and 2012-13 included audit findings 11-02, 12-02 and 2013-02, which indicated that the district's capital assets were not auditable and caused the auditors to issue a qualified report.

2. The district had previously contracted with a vendor for inventory services; however, due to issues with their work, the district has elected to conduct its own inventory and has assigned those duties to its technology department. The technology department is ensuring that all technology items are tagged; however, there is some confusion over who is responsible to tag other items with a purchase price of \$500 or more. For new items, the business technician notifies the information technology director of its arrival and the technology department then tags and records the item. A copy of the master inventory report generated on January 23, 2014 lists 2,834 records of items such as furniture, business machines, computers, printers, audio visual equipment and other items totaling \$3,928,805. In addition, district staff reported that the new Escape software has a module for fixed assets and they intend to use it.
3. The 2012-13 audit report noted that the district intended to perform the physical inventory during winter break of 2013-14 and complete its physical inventory by spring of 2014. The actual physical inventory was completed as of FCMAT's fieldwork, and technology staff reported that they anticipated completing the inventory report by mid March 2014. The recording of capital assets is still under way. According to the 2012-13 audit report, the district had hired a firm to complete land valuations for the 2013-14 fiscal year. That report was to be completed by December 30, 2013, with the business manager updating policies and procedures for inventory and capital assets by the end of 2013-14. As of the time of FCMAT's fieldwork, the adjustments to the capital assets had not yet occurred because the former CBO had not yet turned that item over to the new business manager.
4. Staff reported that purchase orders continue to be processed in one to two days even with the change to the Escape accounting software. The district began using an online purchase requisition system three years ago and has continued this with its change to Escape. District staff were provided with training in the Escape module for purchasing and with ways to obtain answers to their questions; however, staff were united in their desire to receive additional training to reinforce their knowledge of and proficiency in using the requisition system. In addition to more basic training, staff would benefit from an annual inservice 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 business manager and the business technician via telephone and email, thus saving staff time.
5. 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 still not aware of any employees or students who have received items at their homes instead of at district sites. Unlike the 2010-11 audit report, neither the 2011-12 nor the 2012-13 audits mentioned home delivery of purchases in either ASB or district expenditure testing.

6. Staff reported that purchase orders are required for all purchases; however, expenditure testing in the 2011-12 audit contained findings in this area. None were noted in the 2012-13 audit. With the change to the Escape software, the purchase order process was changed to accommodate Escape's online requisition capabilities. 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 funds 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 business manager to authorize, prepare and process the transfer. Once budget issues are resolved, the requisition is forwarded to the business office.
 - Any backup for the requisition is scanned and uploaded into the Escape system.
 - The business technician reviews the account coding.
 - The business manager approves the requisitions electronically, prints the purchase orders automatically generated by the approval process in Escape, and submits them to the business technician for ordering. The assistant superintendent of administrative services 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, the business technician processes it for payment and prepares the accounts payable batch. Accounts payable warrant batches are prepared weekly. The business manager reviews and approves the warrant list and individual invoices. Once approved, the business technician sends the batch to the Monterey County Office of Education for processing. Warrants are then returned to the business technician 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 small number of business office staff creates a less than optimal internal control environment; however, the district plans to hire a full-time payroll/benefits technician, which should allow duties to be separated to ensure that warrants are not returned to the employee who processed them for payment.

7. FCMAT requested samples of the district's accounts payable purchases for testing. Of the 20 items requested, the following anomalies were noted:
- Ten of the 20 accounts payable packets, or 50%, did not include purchase orders (POs).
 - Five of the 10 packets that did contain POs had invoices dated prior to the date of the PO.
 - Seven of the 20 accounts payable packets, or 35%, lacked either a receiver document or a signature approving payment.
 - Eleven of the 20 packets did not need a separate contract between the vendor and the district. Of the nine packets that did, three had contracts attached:

- Two of the contracts were signed by the business manager; however, there were no minutes or other evidence of state administrator approval of the contract.
- Two were signed by the state administrator; however, there was no evidence in the accounts payable packet that the item had been included for review at a public meeting.

Of the six packets that did not have contracts attached:

- Two were for specific services such as supplemental educational services (SES) and special education services provided to the district from outside entities.
- One was for mileage paid to a parent for transportation of a special education student; however, without a contract or notation that this was part of an individualized education plan (IEP), there is no evidence of the district's obligation for the payment. In addition, the payment packet lacked verification of the student's attendance on the days for which the district was paying for transportation.
- Three were for items such as copier lease/purchase, software licenses, and construction payments when cost exceeded bid limits; however, no documentation that the bidding process had been followed was included in the payment packet.
- One accounts payable packet was a scholarship award paid directly to the scholarship recipient. It is best practice to pay scholarship amounts to the institution of higher learning or a college bookstore to avoid the appearance of a gift of public funds.
- None of the packets included invoices or receipts with a notation or stamp indicating that the item had been paid. Cancelling vendor invoices by using a "Paid" stamp or other identifiable means is essential to ensure that invoices are not paid a second time if they become separated from their payment package.

When entering into agreements with consultants, it is best business practice to memorialize that arrangement with a written contract. The contract should include the duties of each party, such as the consultant's obligation to complete a W-9 form prior to any payment by the district, the consultant's insurance coverage, and the consultant's fingerprint requirements. These provisions help protect the district and its students. In addition, a contract is not legally enforceable until a district-authorized signatory has signed the contract and the agreement has been approved or ratified by the governing board.

Recommendations for Recovery

The district should:

1. Complete its physical inventory of district equipment and capital assets, thus removing an impediment to an unqualified audit opinion.
2. Provide all employees who use the online requisition system with additional basic training as well as an annual inservice 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. Continue to refine and implement procedures to provide for fixed asset accounting for items delivered to sites.
5. Improve internal controls by revising purchasing and accounts payable procedures to further separate the tasks assigned to the business manager and the business technician.
6. Revise and enforce accounts payable procedures to require that a purchase order be completed prior to a purchase.
7. Revise accounts payable procedures to require an approval signature on each invoice or receiver document to be paid.
8. Require that written contracts be entered into for items that exceed bid limits or for large repairs, that those contracts be fully executed before services are performed, and that they be approved or ratified by the state administrator.
9. Ensure that accounts payable procedures require backup documentation or attendance records to support reimbursements.
10. Require all scholarship disbursements be paid directly to the institution of higher learning or college bookstore.
11. Revise accounts payable procedures to ensure that invoices and receipts are marked “paid” after the payment is processed.

Standard Partially Implemented

February 2010 Initial Rating: 1

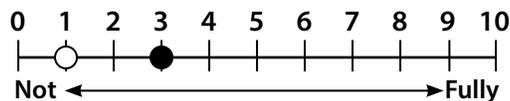
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 3

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

The district had 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 lacked internal controls and standard accounting methods in this area, which left it vulnerable to misappropriation of assets and other fraudulent activity.

Summary of Fifth Comprehensive Review, June 2014

The district has not developed or implemented formal administrative regulations that support Board Policy 3452 but has identified which staff members are accountable for various aspects of ASB functions, including cash collection, record keeping, processing purchase requisitions, ASB oversight at the school site level, ASB leadership, and training.

Findings

1. During this review period the district restructured many district-level positions and in the process redirected the ASB bookkeeping function to school sites. District management provided initial training to school staff charged with ASB accounting; however, school site staff expressed a desire for more training to reinforce proper cash handling, budget management and accounting procedures. The business technician/MOTF support position provides training on the ASB accounting software and assists with questions, yet school site staff indicate that they are having difficulty learning the software and do not have a clear understanding of how to process all the ASB paperwork. It would benefit the district to provide ongoing training for ASB advisors and other school personnel who have ASB accounting responsibilities at least annually and more often during this transition year.
2. The district has implemented previous recommendations to provide outside professional training to district personnel and ensure that ASB personnel have access to the FCMAT ASB manual. 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. However, it is not a substitute for board policy and administrative regulations that provide guidance. This is particularly important now that the ASB function have moved to the school sites.
3. Internal controls include policies and procedures designed to provide the governing board and management with reasonable assurance that the ASB achieves its

objectives and goals. Standard 11.2 will discuss internal controls in depth; however, without policies, procedures, and effective oversight by management, the district is at great risk for fraud, misappropriation of funds or other illegal activities.

4. Board Policy 3452, Student Activity Funds, was adopted in December 2010 and provides a broad overview and 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 control processes and procedures to provide reliable financial information and reduce the risk of fraud and abuse.
 - The policy states that the procedures shall provide adequate training for staff and students; guidance for campus events; uses of funds; and accounting and recordkeeping procedures.
5. As discussed in Standard 11.2, the district has not developed or implemented formal administrative regulations that support Board Policy 3452, but has identified which staff members are accountable for various aspects of ASB functions including cash collection, recordkeeping, processing purchase requisitions, ASB oversight at the school sites, ASB leadership, and training.

It would benefit the district to adopt formal administrative regulations that provide board direction to staff, ensure effective administrative oversight, and clearly define the roles and responsibilities of personnel involved in managing student body activities and funds. In addition, having administrative regulations in place would reinforce the recent efforts to address this long-standing issue. A formal administrative regulation should include at least the following:

- 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 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.

Recommendations for Recovery

The district should:

1. Adopt and implement formal 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 policies and procedures to enforce internal controls to prevent and/or deter fraud or illegal acts, or misappropriation of funds. Policies and procedures should include oversight functions for 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

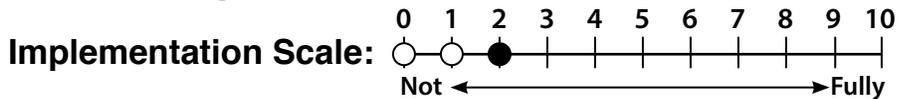
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 2



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.

Summary of Fourth Comprehensive Review, March 2013

The district provided ASB training and a FCMAT ASB Manual to staff. The district had not identified all staff members responsible for ASB tasks or their individual responsibilities. This needed to occur, and special attention needed 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 needed to be developed, and school administrators needed to be held accountable for oversight.

Summary of Fifth Comprehensive Review, June 2014

Many ASB functions are assigned to various school site employees who have limited training in ASB accounting procedures and will need intensive guidance during the first year transition as well as continued annual training and support.

Both comprehensive high schools have consistent ASB guidelines that strengthen internal controls. The district has also implemented previous recommendations for stronger internal controls for gate receipts and for the custodial and security arrangements for athletic events.

Club advisors expressed frustration with changes in district guidelines and a cumbersome approval process for ASB fundraising events. There is no direct communication from the business office to advisors. Events held last year with proper approvals are now subject to different rules that have not been communicated clearly.

Findings

1. Internal controls include policies and procedures designed to provide the governing board and management with reasonable assurance that the ASB achieves its objectives and goals. Because ASBs process several thousands of dollars in cash and checks each school year, effective internal controls for ASB accounting are essential. Control activities include segregation of duties; limiting access to assets (cash); review and approval by management; regular reconciliations; and establishing policies, procedures and standards of conduct. Currently, cash collected at the school sites is transferred to the business office. The business manager is responsible for making bank deposits and reconciling the bank statements. This arrangement does not provide adequate separation of duties and does not meet the standards for effective internal controls. It would benefit the district to develop policies and procedures to ensure adequate internal controls, including separating bank deposit and reconciliation duties, to prevent and/or deter fraud, illegal acts, or misappropriation of funds.

2. Cash deposits counted at the school site are counted again 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. This would provide proper segregation of duties for the banking function discussed earlier in this section.
3. As discussed in Standard 11.1, the district has not developed or implemented formal administrative regulations that support Board Policy 3452 but has identified which staff members are accountable for various aspects of ASB functions including cash collection, recordkeeping, processing purchase requisitions, ASB oversight at school sites, ASB leadership, and training. Many of these functions are assigned to various school site employees who have limited training in ASB accounting procedures and will need intensive guidance during the first year transition as well as continued annual training and support. Each school site has consistent ASB guidelines that strengthen internal control management. The district has also implemented previous recommendations for stronger internal controls for gate receipts and for the custodial and security arrangements for athletic events.

Club advisors expressed frustration regarding changes in district guidelines and a cumbersome approval process for the ASB fundraising events. The business manager communicates with the ASB clerk, and ASB advisors communicate with the school principals, but there is no direct communication from the business office to advisors.

Events held in the 2012-13 school year with proper approvals are now subject to different rules that have not been communicated clearly. Each event must be approved by the business manager, yet club advisors do not receive communication and details regarding denials in a reasonable period of time. As a result, some club advisors have decided not to hold events that have been long-standing in the community. A review of emails suggests a quick turnaround by the business manager on issues, but management should address staff concerns regarding communication. Club advisors indicate that there was some training but do not feel that they understand processes and procedures as they relate to their direct responsibilities. It would benefit the district to ensure that ASB advisors for each club receive training on the step-by-step process for event approvals, use of appropriate forms for fundraising activities, and processing checks including those for purchases from open purchase orders.

4. Training agendas dated October 3, October 17 and November 13, 2013 provided by the business manager provide extensive documentation of training with school site administrators and clerks on the following topics:

Requisition processing in the ASB accounting software system

How to add new vendors and create multiple lines for purchase orders

Pre-approval for purchase requisitions, including the attachment of ASB club minutes

Entering an invoice for payment and the required supporting documentation

Required forms for deposits and necessary support documentation

How to account for sales at snack bars and food fairs

How to use the FCMAT ASB manual

Roles and responsibilities of the business office, site administrator, ASB advisor and ASB clerk

Cash collections and how to use the count form

Fundraisers

Pre-approval for reimbursements

5. Audit findings for the 2012-13 fiscal year did not include findings related to ASB.

Recommendations for Recovery

The district should:

1. Monitor this transition and the job combination to evaluate its effectiveness. A different configuration and realignment of job duties and responsibilities may be required.
2. Develop and implement formal administrative regulations that support Board Policy 3452.
3. Continue training site personnel, including ASB advisors, in processes and procedures.

Standard Partially Implemented

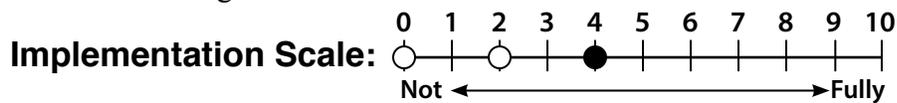
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 0

March 2013 Rating: 2

June 2014 Rating: 4



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)

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 indicated that the district continued to provide multiyear financial projections (MYFPs) for the general fund at each reporting period. However, the MYFP prepared with the 2012-13 adoption budget indicated a negative ending balance in the unrestricted general fund in fiscal year 2014-15. Therefore, significant work remained to address the district's structural deficit.

Summary of Fifth Comprehensive Review, June 2014

The first, second and third interim reports for fiscal year 2012-13 and the adopted budget and first interim report for 2013-14 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 2013-14 first interim report shows unrestricted general fund deficits of \$330,126 for 2014-15 and \$284,592 for 2015-16, indicating that some work remains to address the district's structural deficit.

Findings

1. A review of the district's 2012-13 first, second and third interim reports and the 2013-14 adoption budget and first interim report 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.
2. The assumptions provided with the 2013-14 adoption budget included the following discrepancies:
 - The narrative did not include assumptions for step and/or column increases, but the MYFP included approximately 1% per year for certificated employee salaries and .50% for classified employee salaries.
3. The assumptions provided with the 2013-14 first interim report included the following discrepancies:
 - The narrative did not include assumptions for average daily attendance (ADA).
 - The narrative did not include assumptions for step and/or column increases, but the MYFP included approximately 2% per year for certificated and classified employee salaries.

- The district's most recent MYFP was completed with the 2013-14 first interim report and included the following projected amounts for the district's unrestricted general fund:

	2013-14	2014-15	2015-16
Increase/(Decrease) in Fund Balance	217,478	(330,126)	(284,592)
Ending Fund Balance	1,419,965	1,089,838	805,245

Based on these projections, the district still has some work to do to ensure that there is structural balance between anticipated revenue and expenditures. However, the projection indicates that the district will meet the 3% reserve for economic uncertainties in the current and two subsequent fiscal years.

The above projections do not include additional draws from the state loan proceeds. The remaining balance of \$2,985,000 held in fund 17 at the first interim reporting period is included as a separate component of the available reserves shown in the general fund MYFP; however, the executive summary accompanying the first interim report states, "funds are being held in anticipation of the payments that will be due to the State for audit findings from the 2010-11 and 2011-12 fiscal years which are currently being arbitrated."

The projection also includes an annual debt service payment of approximately \$1,240,000 for the state loan. The loan's 20-year repayment period began in 2010-11.

Recommendations for Recovery

The district should:

- Continue taking steps to eliminate its structural budget deficit.
- Ensure that its MYFPs include a detailed list of assumptions that use the most current information available.
- Ensure that amounts reserved for items such as audit findings are properly identified in the MYFP.

Standard Partially Implemented

February 2010 Initial Rating: 1

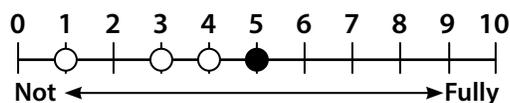
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

Memoranda of understanding (MOUs) with employee bargaining units needed to be included in the board packet, and MYFPs needed to be prepared for MOUs if they contain a significant financial impact. A structural deficit remained in the district's budget and multiyear projections, and guidelines for collective bargaining were needed to ensure fiscal solvency.

Summary of Fifth Comprehensive Review, June 2014

Public disclosure documents, including MYFPs, need to be prepared for all collective bargaining agreement settlements. All memoranda of understanding (MOUs) with employee bargaining units need to be included in the board packet, and public disclosures and MYFPs need to be prepared for MOUs if they contain a significant financial impact. A structural deficit remained in the district's unrestricted general fund multiyear financial projections for 2014-15 and 2015-16.

Findings

1. On June 25, 2013, the state administrator approved the collective bargaining agreement with the district's certificated employee association for July 1, 2013 to June 30, 2014. However, as discussed in Standard 14.1, public disclosure documents, including an MYFP, were not included in the board packet.

As discussed in Standard 14.1, several MOUs were also negotiated and signed; however, they were not all presented at a public meeting for ratification, nor were public disclosures and MYFPs prepared for them.

2. On September 12, 2013, the state administrator approved the collective bargaining agreement with the district's classified employee association for July 1, 2013 through June 30, 2016. As discussed in Standard 14.1, public disclosure documents, including an MYFP, were prepared and included in the board packet.

The district continues to make significant progress toward balancing its budget. However, the 2013-14 first interim MYFPs for the unrestricted general fund include deficits of \$330,126 in 2014-15 and \$284,592 in 2015-16. The remaining \$2,985,000 in state loan proceeds held in fund 17 are included in the total available reserves in the 2013-14 first interim MYFPs.

Recommendations for Recovery

The district should:

1. Include all MOUs with employee bargaining units in the board packet.
2. Prepare public disclosures, including MYFPs, for MOUs with employee bargaining units if there is a significant financial impact.
3. Continue to ensure that guidelines developed for collective bargaining align with the goal of fiscal solvency.

Standard Partially Implemented

February 2010 Initial Rating: 1

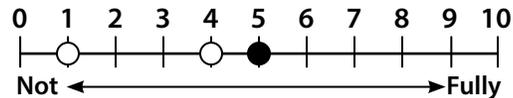
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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))

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.

Summary of Fifth Comprehensive Review, June 2014

The district negotiated some MOUs and settled negotiations with its employee bargaining units for the 2013-14 fiscal year. Some of the MOUs were not presented at a public board meeting for ratification, nor were all of the required public disclosure documents prepared and presented at a board meeting.

Findings

1. The June 25, 2013 board meeting agenda and minutes include an item titled “Approval of Contract Agreement with KCJUHSDTA” for 2013-14. The agenda item cover sheet states, “There is a potential savings of \$480,000 - \$500,000 to the district.” However, an item regarding AB 1200 disclosures was not on the agenda, and public disclosure documents were not included in the board packet.
2. The September 12, 2013 board meeting agenda and minutes include an item titled “Approval of Ratified CSEA Contract” for 2013-14. The agenda item cover sheet states, “This agreement provides a savings to the district[s] of \$344,222.”

The agenda and minutes also included an item titled “Approval of AB1200 – CSEA.” The AB 1200 agenda item cover sheet states, “There is a one time savings of \$46,480,” and the disclosure documents indicate that the proposed agreement covers the period of July 1, 2013 through June 30, 2016. This information does not match what was included on the agenda item for the CSEA contract.

3. The district negotiated several MOUs with the certificated employee bargaining unit during this review period. The May 15, 2013 board agenda includes two action items: one regarding an MOU for four furlough days, and one for an early retirement incentive. The information provided in the board packet also includes AB 1200 public disclosure documents.

MOUs regarding the following were also negotiated: athletic directors, dated July 19, 2013; school site counselors, dated July 19, 2013; number of monthly payments, dated November 7, 2013; and Common Core curriculum, dated December 17, 2013. These

MOUs were not presented at a public board meeting, and public disclosures were not prepared for them.

4. The June 11, 2013 board agenda includes an action item regarding an MOU with the classified employee bargaining unit for an early retirement incentive. The agenda item cover sheet states, “Depending on the number of employees accepting this incentive, there will be a cost savings to the district.”

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

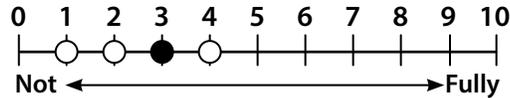
March 2011 Rating: 4

March 2012 Rating: 3

March 2013 Rating: 2

June 2014 Rating: 3

Implementation Scale:



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)

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 indicated 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.

Summary of Fifth Comprehensive Review, June 2014

The district’s and employee bargaining units’ initial proposals for the 2013-14 collective bargaining agreements were sunshined as required by Government Code Section 3547. The district completed negotiations with both bargaining units for 2013-14. The required public disclosure documents for the bargaining agreement with certificated employees were not prepared and presented at a public board meeting, and some of the MOUs with the certificated bargaining unit were not presented at a public board meeting 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 KCJUHSOTA 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 SMCJUHSOTA/KCJUHSOTA Contracts.” The April 17, 2012 meeting minutes indicate that the state administrator approved the district’s proposal.

The December 19, 2012 board meeting agenda included an action item titled “Approval of Negotiations ‘Sunshine’ Proposal for Negotiations with KCJUHSOTA” for the initial proposal from the certificated employee bargaining unit for the 2013-14 contract.

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 titled “Approval of Negotiations Proposal ‘Sunshine’ for Successor Agreement of SMCJUHSOTA/CSEA Local 529 Contract.” The April 17, 2012 meeting minutes indicate that the state administrator approved the district’s proposal.

The January 16, 2013 board meeting agenda included an action item titled “Approval of ‘Sunshine’ Proposal for Negotiations with CSEA” for the initial proposal from the classified employee bargaining unit for the 2013-16 successor agreement.

3. As discussed in Standard 14.1, the district settled negotiations for 2013-14 with its certificated and classified employee bargaining units. Each agreement was presented at a public board meeting before ratification; however, the required public disclosure documents associated with the collective bargaining agreement with certificated employees were not presented prior to ratification as required by Government Code Section 3547.5.
4. As discussed in Standard 14.1, the district negotiated some MOUs with its certificated and classified employee bargaining units. Some of the MOUs with the certificated bargaining unit were not presented at a public board meeting as required by Government Code Section 3547.5.

Recommendations 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 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

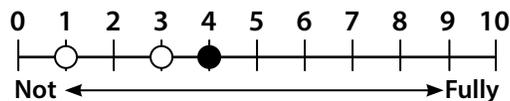
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 3

June 2014 Rating: 4

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Information regarding collective bargaining was provided to the board members in closed session. The newly appointed state administrator planned to include some management staff members on the district's negotiating teams for the 2013-14 collective bargaining agreements.

Summary of Fifth Comprehensive Review, June 2014

Information regarding collective bargaining continues to be provided to the board members in closed session. Some management staff members were included on the district's negotiating teams for the 2013-14 collective bargaining agreements.

Findings

1. Board meeting agendas, minutes and interviews continue to indicate that the state administrator provides information regarding negotiations with the district's employee bargaining units 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 units 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. Employees interviewed indicated that the state administrator included some management staff members on the district's negotiating teams for the 2013-14 collective bargaining agreements. The district's team for classified negotiations included the state administrator, business manager, human resources administrator and an assistant principal. The team for certificated negotiations included the state administrator, the business manager, the human resources administrator and a principal. Including staff members on the district's negotiating team 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 to include district staff members, such as the CBO and the human resources administrator, on the district's negotiating teams.

Standard Partially Implemented

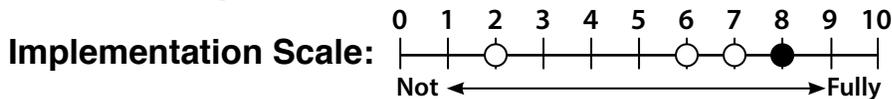
February 2010 Initial Rating: 2

March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



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

Summary of Fourth Comprehensive Review, March 2013

The district faced 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 was converting its financial reporting and human resources software systems to Escape Technology, Inc., effective July 1, 2013, as were other districts throughout Monterey County. Several staff members expressed concerns about adequate training and readiness for this conversion.

Summary of Fifth Comprehensive Review, June 2014

The county office converted all districts in Monterey County to a new financial and human resources software system developed by Escape Technology, Inc. as of July 1, 2013. This system integrates payroll, position control, budget, budget development, purchasing and general ledger in one software application. The district has continued working with the county office to resolve problems, and the county office has provided adequate training and support.

District staff will continue downloading data from Aeries and uploading the Aeries attendance data for CALPADS reporting, and will need to implement methods to validate this data.

Findings

1. The district is appealing previous audit findings that could result in a loss of hundreds of thousands of dollars because attendance was incorrectly recorded and/or reported to the state. Continual ongoing training is vital to ensure that the district collects all the state revenue it is entitled to receive. District administrators have implemented training for staff who are directly involved with attendance reporting at the school sites. Attendance reports teachers submit now include an additional step to review each report for the proper signature.
2. The district has an Aeries support team that meets regularly to provide ongoing support and sharing among those involved in attendance reporting. This team includes the information technology director, the data system analyst, student support staff, secretaries and registrars. The team is designed to create a collaborative process for exchanging

information between attendance and student support personnel. The team holds monthly meetings and encourages representation from both comprehensive high schools. Principals are supportive and understand the importance of this working group.

3. Attendance training is scheduled for all new teachers and administrators. The district needs to expand training opportunities for all teachers. Training needs to include information on procedures for attendance reporting and required elements for independent study compliance and funding so that the district can eliminate substantial funding losses that have occurred in this area. Teachers will also need to be made aware of the consequences for falsifying attendance records, and administrators need to be reminded of their oversight responsibility for these important records.
4. The county office converted all districts in Monterey County to a new financial and human resources software system developed by Escape Technology, Inc. as of July 1, 2013. This system integrates payroll, position control, budget, budget development, purchasing and general ledger functions in one software application. According to district staff, the transition to Escape went well. The district has continued working with the county office to resolve problems, and the county office has provided adequate training and support following the conversion.
5. Now that the district has converted to the Escape system, staff will continue downloading data from Aeries and uploading the Aeries attendance data for CALPADS reporting. District staff will need to implement methods to validate this data.
6. The district's technology department staffing has increased following a district-level restructuring. The current staffing configuration includes the director, a data system analyst, one full-time technician I, and one part-time technology assistant. The technology staff provide central operations to support a wide spectrum of technology services districtwide including the implementation of new software, training, troubleshooting and updating the districtwide technology plan.
7. The district has a new technology plan for July 1, 2013 through June 30, 2016 that was developed with the input of many stakeholders and that can be found on its website. The technology plan is 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. One goal states that computers more than five years old will be replaced. During the 2013-14 fiscal year, the district replaced 203 computers in classrooms and computer labs at both comprehensive high schools using savings from the restructuring of the district's state loan. Because the loan restructuring is based on the difference between the original interest rate and the most current market rate, the district should review multiyear commitments for using possible savings that provide a reoccurring revenue stream to support future technology plans because there is no certainty of absolute savings in any one year.
8. During this review period, the district upgraded to GroupWise 2012 for its email, which provides better compatibility with mobile devices. The district uses Odysseyware for

credit recovery and accelerated credit programs at both comprehensive high schools. Both high schools also use Odyssey for the Saturday school program. King City High School has dedicated class periods in the master schedule and after-school program that give students the opportunity for credit recovery.

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

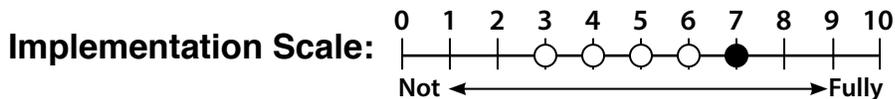
February 2010 Initial Rating: 3

March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

As the district prepared to transition to the new Escape software system, management needed to be more involved with ensuring that appropriate training was provided to district employees. Data export and import routines needed to be developed to validate the accuracy of information during the first year of transition. In addition, the district was not in compliance with requirements for direct certification of students who were eligible for assistance programs.

Summary of Fifth Comprehensive Review, June 2014

The new Local Control Funding Formula (LCFF) is in effect as of July 1, 2013. This formula provides additional supplemental and concentration grant funding to support students' educational needs. Students who qualify for free or reduced-price meals, those who are English learners, and foster youth, generate additional funding; therefore, identifying these students through direct certification and correct identification of student classifications in CALPADS will provide the information needed to maximize funding.

The district will need to ensure that sufficient training is provided for employees who work with CALPADS. Each step in the CALPADS process should be documented for reference. The procedure should include internal controls designed to validate the data during transfer routines and ensure that a data match occurs between systems.

Findings

1. The new Escape system is a fully integrated software application that eliminates the multiple systems that district staff previously used for position control, payroll, employee demographics, purchasing and general ledger accounting. As discussed previously, the district is in its first year of the conversion to the new system and continues to work with the county office to address problems and receive ongoing training.
2. The district validated its human resources and business data after the initial conversion to the Escape system. This effort should continue so that the district can ensure that the system is operating as intended and validate data during this first year.
3. During implementation of the new system, the district restructured positions at the district office and realigned duties and responsibilities. The student information manager position

and truancy specialist position were eliminated. A data system analyst position was added to provide Aeries, CALPADS and Escape system training. The truancy function was transferred to the school sites. The realignment from the district level redirected support staff to the school site level. This decentralization gives the district the opportunity to provide more district-level training and guidance to the school sites.

4. The district's food service program must certify students who qualify for free or 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 the 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, beginning in the 2011-12 school year, to conduct direct certification with SNAP at least three times each school year. The district runs direct certification multiple times each school year; running direct certification at the following times to ensure federal program compliance:

1. July 1
2. The second week of school
3. Six months after the start of school

The technology department uploads direct certification data to CALPADS monthly.

5. The LCFF took effect beginning July 1, 2013. This formula provides additional supplemental and concentration grant funding to support students' educational needs. Students who qualify for free or reduced-price meals, those who are English learners, and foster youth, generate additional funding; therefore, identifying these students through direct certification and the correct identification of student classifications in CALPADS will provide the information needed to maximize funding.

Annual training and cross-training for employees responsible for CALPADS would benefit the district, as would documenting for reference each step in the CALPADS process, including importing data to CALPADS from Aeries. The procedure should include internal controls designed to validate the data during transfer routines and ensure that a data match occurs between systems.

Recommendations for Recovery

The district should:

1. Establish methods to validate data during the first year transition to the new Escape system.
2. 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 from Aeries into CALPADS.
3. Provide annual training for employees who are required to download and upload critical data from one system to another, including training in proper validation procedures.
4. Continue the monthly direct certification process.

Standard Partially Implemented

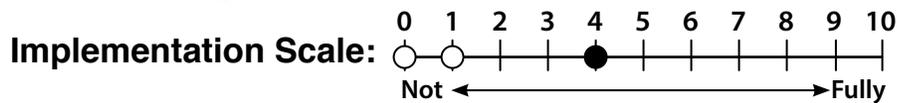
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

The district 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 needed to identify dedicated revenue sources to support improving its technology, upgrading infrastructure and replacing obsolete equipment.

Summary of Fifth Comprehensive Review, June 2014

During this review period, the district purchased replacements for 203 computers more than six years old and 135 more than nine years old in classrooms and computer labs at Greenfield High School. The replacement plan is expected to be complete by June 30, 2014. The district's financial condition limits its ability to support new hardware and software purchases; however, the district has identified funding to support its technology plan and is included this in its multiyear financial projection.

Findings

1. The district has, with the assistance of an experienced consultant, successfully processed several applications for Internet and telephone E-Rate reimbursements. At the time of fieldwork, the district was reviewing bids for the E-Rate program and selecting vendors. Free and reduced-price meal counts directly correlate 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. E-Rate funding requests total \$77,959.98 for the 2016 cycle.

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. These applications are also available on the district's website, making it easier for food service staff to obtain them, address questions and increase E-Rate funding.

2. The district has developed a comprehensive technology policies and procedures manual designed to complement and support the technology plan. The manual offers users guidance, policies and procedures regarding email etiquette, web page publishing, privileges for students and staff, disposal of equipment, standards for hardware and software, and disposal of equipment.

All hardware and software purchases are required to conform to the district's technology standards listed in the manual and must be approved by the information technology director prior to purchase. During this review period the district purchased computers to replace 203 computers more than six years old and 135 more than nine years old in classrooms and computer labs at Greenfield High School. The replacement plan is expected to be complete by June 30, 2014.

3. The Linux operating system offers a wide variety of functions including remote help desk and online computer repair service. The district upgraded to GroupWise 2012 during this reporting period. This upgrade provides a messaging and collaborative software platform for email, calendars and document management. GroupWise 2012 supports Windows and Linux servers and is compatible with new mobile devices.
4. The district's technology infrastructure supports the interconnectivity of hardware and software and 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.

The district's financial condition limits its ability to make new hardware and software purchases and support them; however, as previously discussed, the district has identified funding as a result of the restructuring of its state loan, and this funding is included in the district's multiyear financial projection. Supporting hardware and software needs is a high priority because technology changes at a rapid pace. This new funding gives the district the ability to replace obsolete hardware, upgrade infrastructure, provide adequate bandwidth, and attract qualified and experienced technicians to help it stay current with the increasing demands 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. Use the new funding to replace obsolete equipment and update infrastructure to support new technologies.

4. Ensure that technicians are sufficiently qualified and experienced to support existing and future technology needs.

Standard Partially Implemented

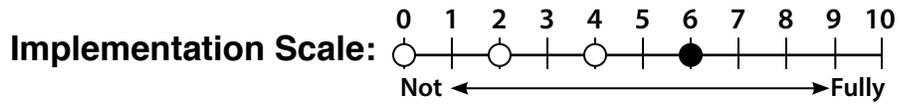
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6



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.

Summary of Fourth Comprehensive Review, March 2013

School sites had used restricted funding sources to purchase and upgrade computer systems and peripheral devices. However, the district had not developed a replacement schedule to support this endeavor and continued to report that more than 40% of its computers were more than four years old. The district did not have a dedicated revenue stream to support and complement the school site funding in this area. In addition, sensitive technology equipment lacked temperature monitoring sensors.

Summary of Fifth Comprehensive Review, June 2014

Central office staff rely on software, computers and network services for student data reporting, student assessments, student attendance and parent notifications. As a result, these staff depend on the technology department for assistance and support to complete these functions, which will be an integral part of the new mandates associated with the Local Control Accountability Plan (LCAP).

Findings

1. The district maintains a comprehensive inventory system for technology devices at each school site. The technology plan includes goals to replace computers and peripheral devices that are more than five years old. Ensuring that students have access to the latest technological equipment is one of the new LCAP state priorities and is essential for students' educational experience. Curricula that depend on the use of computers, peripheral devices and the Internet are crucial to learning and ultimately the students' educational success.

Central office staff rely on software, computers and network services for student data reporting, student assessments, student attendance, and parent notifications and thus depend on the technology department for assistance and support to complete these functions, which will be part of the new mandates for the LCAP.

2. A properly functioning technology department requires an appropriate number of skilled technicians and adequate funding to support new and existing technology. Therefore, it will be important for the district to continue its efforts to upgrade infrastructure and replace obsolete computers and equipment according to its technology plan.

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

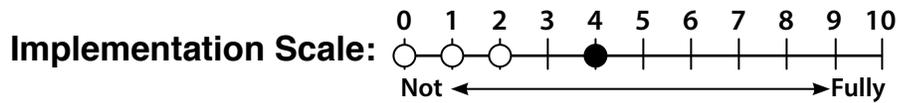
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 4



16.1 Maintenance and Operations Fiscal Controls

Legal Standard

Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.

Summary of Fourth Comprehensive Review, March 2013

A physical inventory of fixed assets was completed in 2011-12 and again in 2012-13, and staff reported that the district has implemented procedures to ensure that all new equipment had an asset tag affixed and that the applicable information was entered on the master inventory report. Board agenda items related to surplus property needed to include information indicating whether the combined value of the items exceed \$2,500 and the method to be used for disposal.

Summary of Fifth Comprehensive Review, June 2014

The district's technology department will conduct a physical inventory beginning in 2013-14, and the district plans to have all inventoried items recorded in Escape in 2014-15. In interviews, staff expressed some confusion regarding whether or not the business technician/MOTF support position is responsible for placing an asset tag on non-technology equipment that must be inventoried. Board agenda items related to surplus property did not 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 for inventory services in 2012-13. Staff indicated that the district's technology department will conduct the physical inventory starting in 2013-14 and that all inventoried items will be recorded in the Escape software system beginning in 2014-15.
2. The master inventory report dated January 23, 2014 lists numerous categories of inventoried items, including audiovisual equipment, computers, printers, furniture, athletic and instructional equipment, custodial and maintenance equipment, and vehicles. However, as discussed in Standard 10.5, the district's June 30, 2012 and 2013 audit reports continue to include findings, 12-02 and 2013-02 respectively, indicating that the district's capital assets were not auditable. This resulted in the auditors issuing a qualified report.
3. Staff reported that the technology department receives a copy of purchase orders that include technology items to be tagged and is responsible for entering data into the inventory software regarding newly acquired assets and assets designated as surplus. However, in interviews employees indicated some confusion regarding whether or not the business technician/MOTF support position is responsible for placing an asset tag on non-technology equipment that has a purchase price of \$500 and entering this information into the inventory software.

- Board meeting agendas and minutes for this review period include items regarding the disposal of surplus property, including textbooks, technology equipment and vehicles. At the June 11, 2013 board meeting the state administrator approved a contract with InterSchola Trading Company, LLC for the sale of surplus district vehicles.

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 depend 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, and the surplus property agenda item dated March 13, 2013 did not indicate the method to be used for disposal.

Recommendations for Recovery

The district should:

- 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.
- Implement procedures to ensure that all fixed assets are accounted for properly and have an asset tag placed on the item.
- 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.
- 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

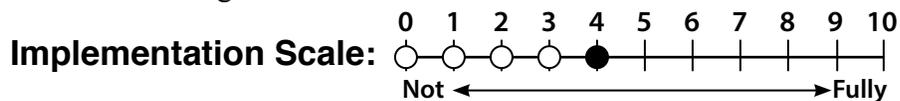
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 4



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.

Summary of Fourth Comprehensive Review, March 2013

Menu selections were lacking and the district needed to work with its contracted vendor to improve them. The food and nutritional services manager needed 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 was in direct competition with the National School Lunch and School Breakfast programs, which jeopardized program funding. The district needed to act immediately to stop these prohibited activities.

Summary of Fifth Comprehensive Review, June 2014

Breakfast and lunch menus are posted on each school's website. The district has revised the menu selections to provide nutritious meals and make the menu more appealing to students.

A total of 1,291 students districtwide are eligible to receive free or reduced-price meals during the 2013-14 school year. This is a significant increase compared to the prior year data reported by the CDE, which shows a total of 770 eligible students.

The district has taken measures to ensure that unauthorized fundraising activities on the King City High School campus that previously interfered with the food service program do not occur.

Findings

1. The district participates in the National School Lunch and Breakfast programs. At the beginning of the 2013-14 fiscal year, the district did not renew its contract with Preferred Meal Systems, Inc., an outside vendor, to provide meal plans and meals for breakfast and lunch. The elementary school district provided meals until mid-January 2014, allowing the district to restructure staffing and operations. In January 2014, the district introduced prepared meals from Sysco Foods, Inc. that meet the daily nutritional requirements.

The district's food services department was restructured concurrent with the hiring of a permanent business manager. The restructure included the elimination of the food and nutritional services manager position. Food service lead positions oversee day-to-day operations at each school site and report directly to the business manager, who oversees all aspects of the food service program. Each school received a roving food service cart that serves à la carte items to students at locations other than the cafeteria. The food carts at both comprehensive high schools generated an average of approximately \$146 per day in sales from October 22, 2013 through January 28, 2014, as shown in the following table:

Month/Year	Total of Days – Both Sites	Sales	Average Per Day
October 2013	15	\$2,035.00	\$135.67
November 2013	36	\$5,669.75	\$157.49
December 2013	17	\$2,454.50	\$144.38
January 2014	18	\$2,435.00	\$135.28
Total	86	\$12,594.25	\$146.45

2. The district’s food service staffing is configured as follows:
 - One lead at each school site. Increased by one hour per day.
 - One five-hour-per-day cafeteria worker
 - One two-hour-per-day cafeteria worker for the food cart
3. Students enter the cafeteria in two lines, and their food selections must meet the requirements of a reimbursable meal in accordance with state guidelines. Both lines converge at the center, where students enter their personal identification number on a key pad and then exit the kitchen area. One worker is responsible for refilling the main food line; the other observes each student’s tray to ensure that they have a complete reimbursable meal selection, monitors the key pad, and collects cash when needed.
4. FCMAT observed several instances in which the food service worker responsible for ensuring that students have all items required for a reimbursable meal was sidetracked helping students in one line with food selections, during which time students in the other line exited the kitchen area without all items required for a reimbursable meal.

The district has made several meal changes to improve its food offerings for students while maintaining compliance with federal and state nutritional regulations. Sysco provides ready-made meals that staff heat and serve. The average cost per meal has declined from \$2.50 to \$2.00. Students questioned stated that the food selection and quality has improved but expressed a desire for continued improvement.

Breakfast and lunch menus are posted on each school’s website. The district has revised the menu selection to provide nutritious meals that are appealing to students. The website offers a monthly menu at a glance and healthy nutrition tips each month. The food service program offers a variety of entrées that appeal to high school students including pizza slices, veggie burgers and hamburgers, hoagie and deli sandwiches, Rib-B-Q or spicy chicken on a bun, and burritos.

5. The food service program underwent a Nutrition Services Division (NSD) investigation following a complaint that alleged the following:
 - The district required parents to complete the free and reduced-price meal application.
 - There is no food service director overseeing the food program.
 - King City High School does not keep temperature logs.
 - The school sites do not correctly maintain and document production records.

On August 22, 2013, the NSD visited both comprehensive high schools unannounced to interview students and staff. The NSD investigative team's report noted some areas that needed improvement; however, the required corrective action plan the district submitted was able to resolve all concerns, and the CDE closed the investigation on January 14, 2014. As a result of the investigation, the district has contracted with a food service consultant to ensure compliance and continued staff training.

6. Counts of students who are eligible for free and reduced- price meals based on the October 2, 2013 CALPADS report indicate that 71.9% of King City High School students, 58.8% of Greenfield High School students, and 75.3% of Portola-Butler Continuation High School students are eligible for free or reduced-priced meals. King City High School has a limited open campus policy, and Greenfield High School has a closed campus, yet 13.0% more students are reported as eligible at King City High School than at Greenfield High School. The district needs to review the reported eligibility information because this and other factors affect E-Rate funding, federal grants, and now LCFF funding.

Student Eligibility and Percentage of Enrollment as of October 2, 2013

School	Free & Reduced- Priced Meals	Enrollment	Percentage
King City HS	672	935	71.9%
Greenfield HS	552	938	58.8%
Portola-Butler	67	89	75.3%
Total	1,291	1,962	65.8%

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 number. Because 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. The district had an MPLH of 17.75 for October 2012, which suggested that its food service program was overstaffed for the number of meals served. As a result, the district evaluated the staffing needs and reconfigured staffing accordingly. During the current review period, management was unable to provide MPLH data and is encouraged to continue to monitor staffing accordingly.

7. The cafeteria fund budget for the 2013-14 fiscal year as of January 31, 2014 shows projected program income of \$489,500 and expenditures totaling \$537,173. Thus the contribution from the unrestricted general fund is expected to be \$47,673, which is a significant drop from \$146,654 for 2012-13 fiscal year.

Cafeteria Fund 2012-13 Unaudited Actuals Compared to 2013-14 Budget as of January 31, 2014

Category	2012-13- Unaudited Actuals	2013-14 Budget as of January 31, 2014
Food Services Sales – Local	\$497,860	\$489,500
Food – Expenditures	\$644,513	\$537,173
Unrestricted General Fund Contribution	\$146,653	\$47,673

8. The business manager has received a certificate of achievement in nutrition education training for completing the annual CDE-sponsored training held in the spring of 2013 and has attended the annual food nutrition vendors’ convention. In addition, the business manager is involved with the web-based Child Nutrition Information & Payment System (CNIPS) and plans to receive training in CNIPS alternative food sales. CNIPS offers resources to help implement the payment processing system and provides a user manual. Food service workers have participated in food handler certification training, which trains workers in proper food handling and testing as well as safety procedures.
9. The district hired food service employees beginning in the 2010-11 fiscal year when it began operating its own food service program. Because these employees are now included in the classified bargaining unit, the district has satisfied the FCMAT team’s prior recommendation in this area.
10. The district has taken measures to prevent unauthorized fundraising activities on the King City High School campus that directly interfere or compete with the National School Lunch and School Breakfast programs. The district will need to continue to ensure adherence to program regulations to avoid jeopardizing both federal and state funding. Losing this funding would mean the district would bear the total cost of meals for students who qualify for free and reduced-price meal assistance. School site administrators will also need to continue prohibiting fundraising 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. Continue to monitor and adjust food offerings, revising menus periodically.
2. Investigate the large difference between the two comprehensive high schools in the percentage of students who are eligible for free and reduced-price meals.
3. Provide training to the business manager and food service workers.
4. Evaluate the food service program’s efficiency and MPLH monthly, and make adjustments in staffing as needed.

- Continue to monitor fundraising activities on campuses to ensure that they comply with federal and state regulations regarding the National School Lunch and School Breakfast programs.

Standard Partially Implemented

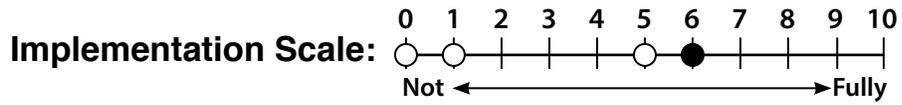
February 2010 Initial Rating: 5

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 6



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.

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 indicated that the district met its 2011-12 and projected to meet its 2012-13 maintenance of effort (MOE) requirements; however, the special education director needed 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.

Summary of Fifth Comprehensive Review, June 2014

The district reduced its special education expenditures by \$166,698 in 2012-13. However, the 2013-14 projected budget shows an increase of \$171,401. The first interim report indicates that the district will meet its 2013-14 MOE requirement, but the information included in the report is not presented consistently. In addition, the director of alternative education needs to be involved in the MOE calculation and provided with access to Escape 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
2011-12 unaudited actuals: resources 3310, 6500	\$933,038	\$2,256,341
2012-13 unaudited actuals: resources 3310, 6500	\$992,150	\$2,089,643
2013-14 projected budget: resources 3310, 6500	\$1,278,508	\$2,261,044

The 2012-13 budget report indicates a reduction in total special education expenditures of \$166,698 from fiscal year 2011-12. The 2013-14 revised budget projects an increase of \$171,401 in special education expenditures of compared to 2012-13. However, an account summary by object balance report dated January 28, 2014 indicates that resource 3310 has a projected ending balance of \$56,540. Allowable special education expenditures need to be moved from resource 6500 to resource 3310 so that there is no remaining fund balance in resource 3310; this would also reduce the projected contributions from the unrestricted general fund.

2. The district's 2012-13 and 2013-14 budgets indicate that revenue limit funds and LCFF funding 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 2012-13 and 2013-14, the unrestricted general fund contribution amounts included in the table above for those years are inflated.

3. The district's 2013-14 projected budget does not include estimated receipts for interagency services between LEAs, although the 2011-12 and 2012-13 unaudited actuals include receipts from this funding source. The 2013-14 projected budget also shows a negative balance for classified employees' salaries and benefit accounts as of January 28, 2014.
4. In 2010-11, the district began operating two classes for severely handicapped students that formerly were operated by the county office. The district continues to operate the class for moderately to severely handicapped students at Greenfield High School, but the transition program 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 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.
6. Documents titled Special Education Billback 2012-13 April Projection and Monterey County Office of Education – Special Education Budget Projection 2013-14 were provided for review. However, these documents do not indicate the estimated 2013-14 transfer of apportionment from the county office to the district or the estimated 2013-14 billback for special education. Best business practices are for the district to use the most recent revenue and cost estimates from the county office and special education local plan area (SELPA) to develop and revise its budget at each reporting period.
7. The 2013-14 first interim special education MOE report, SEMA page 1, indicates that the district projects that it will meet its MOE requirement in 2013-14 using the combined state and local expenditures method. However, pages 3 and 4 indicate that the MOE requirement is not met using the combined method and that the local expenditures only method applies. The 2012-13 unaudited actuals report presented to the board does not include the special education MOE report.

8. During this review period, the district reorganized its administrative staffing structure and hired a director of alternative education who is the principal of the continuation high school and oversees special education. Interviews with employees indicated that the director is not yet involved in the MOE calculation.
9. In prior years the district contracted with an 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). Staff indicated that the district is not participating in either reimbursement program in 2013-14.
10. 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 allow districts to request a waiver from the State Board of Education that allows the caseload to be increased to 32 students. Staff indicated that a waiver has not yet been necessary for 2013-14.

Recommendations for Recovery

The district should:

1. Ensure that all allowable special education expenses are charged to resource 3310 so that the resource does not have a projected ending balance.
2. Ensure that revenue limit/LCFF funds for special education students are transferred from the unrestricted general fund to special education.
3. Review the 2013-14 budget line items for classified salaries, benefits, and interagency services between LEAs to ensure that they are projected accurately.
4. Continue to review all special education programs to optimize staffing allocations and workloads.
5. Continue to review contracted special education services provided by outside agencies to determine if the district can provide these services at a lower cost.
6. Evaluate the savings and/or costs for special education classes taken back from the county office and for program changes.
7. 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.
8. Calculate and charge the allowable indirect costs to all restricted programs to accurately show total program costs.
9. Obtain and use the most recent revenue and expense estimates from the county office and SELPA to develop and revise its budget at each reporting period.

10. Ensure that the information included on the special education MOE documents is consistent and that the report is completed and presented to the board at each applicable budget reporting period.
11. Include the director of alternative education in the MOE calculation process, and ensure that the director has online read-only access to the Escape system and the training needed to review the special education budget.
12. Reassess its decision not to participate in the MAA and LEA reimbursement programs. If the district decides to participate, include the director of alternative education in the billing process.
13. 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

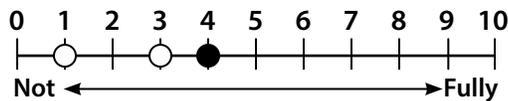
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 4

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Transportation expenditures were reduced by \$114,653 in 2011-12; however, the district needed to ensure that all drivers, including substitutes, were charged to the transportation budget. It was recommended that the district 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.

Summary of Fifth Comprehensive Review, June 2014

Transportation expenditures increased by \$118,479 in 2012-13 and are projected to decrease by \$147,992 in 2013-14; however, the district needs to ensure that costs for all drivers, including employees who are pulled from their normal assignment to drive, are charged to the transportation budget. The district's mechanic recently resigned, which could increase the need for additional bus drivers if the district is unable to fill this position quickly.

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
2011-12 unaudited actuals: resource 7230	\$99,344	\$441,641
2012-13 unaudited actuals: resources 7230 and 7240	\$251,390	\$560,120
2013-14 projected budget: resources 7230 and 7240	\$79,934	\$412,128

The district's budget reports show an increase of \$118,479 in transportation expenditures from fiscal year 2011-12 to 2012-13 and a projected reduction of \$147,992 from 2012-13 to 2013-14. However, the account summary-balance report dated January 31, 2014 indicates that resource 7230 had a starting balance of \$16,216.81. Therefore, the unrestricted general fund contribution was \$16,216.81 more than necessary in 2012-13 and will be reduced by the same amount in 2013-14.

The budget report shows that a majority of the projected savings in 2013-14 is from reduced professional/consulting services and operating expenses. The 2011-12, 2012-13 and 2013-14 budget reports do not include budget items for direct costs charged to

other district programs for field trips. Employees interviewed indicated that outside vendors provide transportation for field trips but that the district now provides its own transportation for 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. In interviews, staff indicated that the district's mechanic drives a daily bus route and that maintenance and operations staff who have bus driving certificates are often called on as substitute 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.

Staff reported that the mechanic has recently resigned. The district's need for additional bus drivers may increase if it is unable to fill this position quickly.

4. The district's 2013-14 budget indicates that it is phasing out the use of resource 7240 to report costs for transporting special education students. 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.

The LCFF includes home-to-school transportation funding as an add-on for districts that previously received the funds, and requires districts to spend no less than the amount of funds expended for home-to-school transportation in 2012-13 or the amount of state revenue received in 2013-14, whichever is less.

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. Ensure that the home-to-school transportation budget includes the direct costs for transfer of services to the appropriate program for field trips and athletic trips as these items are not approved home-to-school transportation expenditures.
3. Continue to 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.
4. 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 correctly.
5. Ensure that the MOTF supervisor reviews all proposed transportation services before they are included in special education students' IEPs to ensure maximum efficiency.
6. Ensure that all costs for bus drivers, including employees who are pulled from their normal assignment to drive, are charged to the transportation budget to accurately account for program costs.
7. Review the CSAM guidance regarding accounting for special education transportation costs and record applicable expenses as indicated. Be aware of any changes that may occur due to implementation of the LCFF.
8. Calculate and charge the allowable indirect costs to all restricted programs to accurately show total program costs. Be aware of any changes that may occur due to implementation of the LCFF.

Standard Partially Implemented

February 2010 Initial Rating: 3

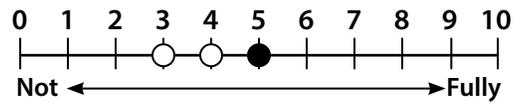
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

The district was in compliance with GASB Statement No. 45 requirements. The latest actuarial report indicated that 113 employees and 10 retirees participated in the defined benefit healthcare plan. The district continued to fund the post-employment benefits using the pay-as-you-go method.

Summary of Fifth Comprehensive Review, June 2014

The most current actuarial report for post-employment benefits shows the estimated annual pay-as-you-go costs of \$95,324 beginning October 1, 2011, projected to rise to \$178,141 by October 1, 2020. According to the pay-as-you-go funding of retiree benefits report, the total amount projected for 2013 is \$83,372. A comparison of the district's budget, encumbrances and actual expenditures through January 31, 2014 with the actuarial study report shows significant variations.

The district failed to include post-employment benefits in its 2013-14 adopted budget, which overstated the ending fund balance. The most current budget estimates total \$170,801, which is twice the amount projected in the actuarial study. The district should evaluate these projections to ensure the accuracy of its projection by reviewing the change in the number of employees and retirees who are eligible for post-employment benefits.

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 eight plans and may elect to pay for additional coverage for dependents. The plans have varying degrees of coverage outside of the health insurance network. This provision presents difficulty because of the lack of hospital coverage within Monterey County. The district continues to work with MCSIG to develop plan offerings that are both affordable and provide adequate hospital coverage.
2. The district's most recent actuarial study for post-employment benefits, dated December 29, 2011 and effective June 30, 2012, was prepared by Total Compensation Systems, Inc. GASB Statement No. 45 rules require a new valuation report every three years if the employer has under 200 employees. The next actuarial report valuation will need to be prepared before the June 30, 2015 effective date.

- The annual required contribution (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. Employers may select an amortization period between 1 to 30 years, which can be either open or closed. The district has selected a closed 30-year amortization period for the initial UAAL, with an open 30-year amortization period for any residual UAAL.

The primary consideration is the balance of the amortized unfunded liabilities for active and retired employees over the valuation period. The following ARC estimates are in compliance with GASB Statement No. 45, according to the most current actuarial report.

Annual Required Contribution (ARC)	
Normal Cost	\$155,008
Initial UAAL Amortization	\$121,486
Residual UAAL Amortization	(\$38,033)
ARC	\$238,461

- 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. According to the most recent actuarial report, the district's annual pay-as-you-go costs are estimated to be \$95,324 beginning October 1, 2011 and are projected to increase to \$178,141 by October 1, 2020. According to the pay-as-you-go funding of retiree benefits report, the total amount projected for 2013 is \$83,372. As comparison of the district's budget, encumbrances and actual expenditures through January 31, 2014 with the actuarial study report shows significant variations, as shown in the following table:

Year	Actuarial Report Projection	2013-14 Adopted Budget	2013-14 First Interim Budget	2013-14 Encumbered as of 1/1/2014	2013-14 Expended as of 1/1/2014
2013	\$83,372	\$0	\$170,801	\$69,091	\$85,656

- The district failed to include post-employment benefits in its 2013-14 adopted budget, which overstated the ending fund balance. The district's most recent budget estimates total \$170,801, which is twice the amount projected in the actuarial study. The district should evaluate these projections to ensure the accuracy of its current projection by reviewing the change in the number of employees and retirees who are eligible for post-employment benefits.
- The district has participated in the California State Teachers' Retirement System's Golden Handshake program. Obligations for early retirement incentive plans are paid from the district's general fund on a pay-as-you-go basis. According to the June 30, 2013 annual audit, this obligation was paid in full. The district offered a new golden handshake to all employees during the summer of 2013; approximately six employees took this offer. FCMAT did not receive information regarding the terms of this offer or the total costs.

7. The audited financial statements for June 30, 2013 show that the district paid \$117,971 in retiree benefits. According to the unaudited actuals for June 30, 2013, the district paid \$102,472, but it is unclear what this amount represents. The adopted budget for the 2013-14 fiscal year does not include an amount for the new golden handshake offer. The district needs to calculate the total obligation and include it in the budget for 2013-14 and in its multiyear financial projection.

Recommendations for Recovery

The district should:

1. Obtain a new actuarial study for other post-employment benefits, to be effective June 30, 2015 as required by GASB Statement No. 45.
2. To address the significant variances between its budgeted amounts and those in the most recent actuarial report as of January 31, 2014, review changes in the number of employees and retirees who are eligible for post-employment benefits.
3. Include in its fiscal solvency plan methods for fully funding the ARC.
4. Calculate the total obligation for the golden handshake offer and include this in its 2013-14 budget and in its multiyear financial projection.

Standard Partially Implemented

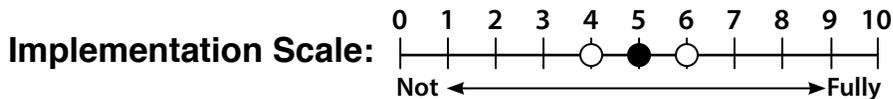
February 2010 Initial Rating: 4

March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 5



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.

Summary of Fourth Comprehensive Review, March 2013

The district continued to provide online training for employees to help reduce workers' compensation claims and minimize liability. These efforts contributed to stabilizing rates and costs. The 2012 hazardous materials report identified specific areas of concern, and it was recommended that the district address these issues immediately.

Summary of Fifth Comprehensive Review, June 2014

A comparison of budget reports for the 2012-13 and 2011-12 fiscal years indicates that workers' compensation expenditures in all funds decreased by \$47,961, or 19.2%. However, the district's budget shows that general fund premiums for workers' compensation are expected to increase by \$100,959 over the previous fiscal year.

The July 22, 2013 hazardous materials survey and inventory of hazardous materials report found hazardous conditions related to storage, labeling and other safety measures, which are deficiencies that must be remedied to achieve compliance with California Occupational Safety and Health Administration (Cal/OSHA) regulations regarding chemicals in the workplace. The district was unable to provide documents showing compliance with these findings.

The most recent property and liability report cited seven high-priority conditions as well as other findings considered medium to low risk. The district should initiate corrective measures for all high priority conditions immediately.

Findings

1. The workers' compensation joint powers authority (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. The JPA issued a statistical report for December 2013 that shows the following claims activity:

Open claims	642
Open indemnity	577
Paid claims	\$236,652
Claims liability	\$25,987,349

A comparison of budget reports for the 2012-13 and 2011-12 fiscal years indicates that workers' compensation expenditures in all funds decreased by \$47,961, or 19.2%. The district was unable to provide detailed information from the JPA for the current fiscal year; however, according to the 2013-14 budget report, as of January 31, 2014 the district expects general fund premiums for workers' compensation to increase by \$100,959 over the previous fiscal year. The district will need to evaluate the budgeted amounts in light of the most recent JPA estimates to ensure accurate budget projections.

2. The district places a high priority on cost containment and prevention measures and offers mandatory and voluntary online training for employees. The district continues to provide online training courses developed by Keenan and Associates, including courses in diversity awareness, sexual harassment, blood-borne pathogens, and chemical storage and handling. Safety training is provided to employees based on worker classifications.

The online program generates a list of employees who are required to have specific training and notifies these employees via email that includes 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. The district is encouraged to request an updated actuarial report from the JPA.
4. On November 13, 2013, the district adopted Board Policy and Administrative Regulation 3514.1, which addresses hazardous substances. It also adopted an environmental safety policy on March 13, 2013 as well as subsequent administrative regulations on January 7, 2014. These policies and regulations provide guidance for safety and the purchase, storage, handling and removal of hazardous substances used in science classrooms and on all district property. Container labeling, material safety data sheets, and employee training and information are essential components of the hazard communication program described in this policy, but the district is not in compliance in this area. Specifically, the policy states that the state administrator/superintendent or designee shall adopt measures to ensure that hazardous substances on any district property are stored and disposed of in accordance with California Code of Regulations (CCR) – 8, CCR 5164 – storage of hazardous substances; 5139-5230 – control of hazardous substances; and Education Code 49411 – chemical listing and disposal of chemicals.
5. The July 22, 2013 hazardous materials survey and inventory of hazardous materials report prepared by Keenan & Associates cites 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. During the previous review period, the FCMAT study team cited this same report. Attached to the July 22, 2013 letter was a list showing the same deficiencies from the previous review period with a checklist for management to complete identifying whom the task was assigned to and the date completed, which was blank. The district was unable to provide documents showing compliance with the following findings:

District Maintenance Facility

- Bus Garage:

Chemicals are stored in secondary containers without proper labeling.

Fire extinguisher is not mounted properly.

- 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.

Chemicals are stored in secondary containers without proper labeling.

Ethyl alcohol currently stored on shelves should be contained in an approved flammable cabinet.

The labeling on a bag containing copper sulfate is not complete.

- 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.

Greenfield High School

- 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.

The district will need to address these deficiencies to comply with Cal/OSHA regulations. Joint powers authority meetings offer beneficial information regarding current claims and trends, which can enable the district to respond to a particular area of concern quickly. It would benefit the district to ensure that its business manager attends these meetings when possible.

6. On June 14, 2013, Keenan & Associates issued a property and liability inspection report based on a physical inspection conducted on February 27, 2013. This inspection was conducted in accordance with the Northern California ReLiEF Safety Inspection Policy. The purpose of the report was to provide the district with information about unsafe conditions based on the observations at the time of the inspection and reduce the frequency and severity of possible property and liability losses.

The district's total losses have been minimal during the last three years. During this time the district incurred two property losses totaling \$1,444, and five liability losses totaling \$119,731. In addition, the report indicates that two of the liability claims totaling \$105,736 involved discrimination and defamation in employment practices, including one claim that totaled \$99,444; the other three claims total \$13,995. The report lists the following conditions as high priority:

- Science prep room – 100 wing, Greenfield High School: Broken glass and spilled chemical product inside the fume; fume hood from the adjacent classroom was found unlocked; and the fume hood and broken glass were accessible to students. The room had unorganized items on both the countertops and piled up on the floor, creating trip hazards.

- Wrestling room – Greenfield High School: Screws securing signage were protruding and are a possible injury hazard. The ledge on the wall is an injury hazard to wrestlers.
- Kitchen – King City High School: Walls behind the dishwashing/sink area were water-damaged. Leaking water was on the floor. Possible fire hazard caused by gas valve in the “on” position for the gas stove that is inoperable, with combustible material stored on the top of the stove.
- Library – King City High School: Natural gas was detected in the library and textbook storage room. Several individuals have reported the smell to the librarian.
- Drama room – King City High School: Electrical panels in the storage area were obstructed and did not meet the 36-inch minimum clearance zone.
- AG Metal Shop – King City High School: Students were observed using cut-off saws that produced sparks that fell onto other students standing behind the machines.
- Warehouse: The hydraulic hoses to the cylinders on the forklift were weathered. One was leaking and the roller chain had not been properly lubricated.

The Keenan & Associates report also has findings regarding medium to low risk conditions. The district needs to immediately correct for all high-priority conditions listed in this report.

Recommendations for Recovery

The district should:

1. Continue developing and monitoring online training programs.
2. Review the 2013 hazardous materials survey report findings for specific areas of concern and address these issues immediately.
3. Continue working closely with the workers’ compensation and the property and liability insurance program JPAs to ensure that the district is implementing preventive measures to minimize property and liability losses.
4. Immediately correct all high-priority conditions identified in property and liability report prepared by Keenan & Associates.

Standard Partially Implemented

February 2010 Initial Rating: 2

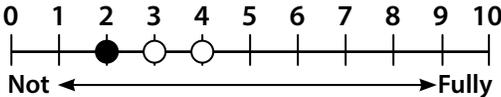
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 2

Implementation Scale:



Appendix A

Positions Interviewed

1. State administrator
2. Board members
3. Business manager
4. Business technician/MOTF support
5. Assistant superintendent of administrative services
6. Human resources administrator
7. MOTF supervisor
8. CSEA chapter president
9. CTA chapter president
10. Director of alternative education
11. Receptionist/human resources assistant
12. Executive assistant
13. Information technology director
14. Data system analyst
15. School site principals
16. School site clerical staff (including attendance clerks, school secretaries, and registrar/truancy clerks)
17. ASB advisors
18. School site council representatives
19. English learner specialist
20. Monterey County Office of Education superintendent, associate superintendent for business services, and finance and business services staff
21. Cafeteria site visit/food service workers, King City High School

Appendix B

Source Documents

1. Board meeting agendas, packets and minutes
2. Board policies and administrative regulations
3. District website
4. State administrator's blog
5. Annual audit reports: 2008-09, 2009-10, 2010-11, 2011-12 and 2012-13
6. Adoption budget report, 2013-14
7. First, second and third interim reports, 2012-13
8. First interim report, 2013-14
9. Unaudited actuals report, 2011-12 and 2012-13
10. Budget advisory committee list, agendas and minutes 2013-14
11. District organizational chart, December 4, 2013
12. Bank statements and reconciliations: October, November and December 2013
13. Monthly payroll reconciliation forms and payroll reports for October, November and December 2013
14. Debt service schedule for state loan
15. Monterey County Office of Education budget review letters for 2013-14 adopted budget, 2012-13 first and second interim reports, and 2013-14 first interim report
16. Master inventory report, January 23, 2014
17. Various financial system budget reports: 2011-12, 2012-13 and 2013-14
18. Special education maintenance of effort report, 2013-14 first interim
19. Special Education Billback 2012-13 April Projection, May 16, 2013
20. Monterey County Office of Education – Special Education Budget Projection 2013-14, May 15, 2013

21. Department of California Highway Patrol Carrier Inspection, January 16, 2013
22. Account summary balance reports, 2013-14
23. LCFF calculations, 2013-14
24. P-1, P-2 and annual attendance reports, 2012-13 and 2013-14
25. Accounts payable payment listings, July 1, 2012 – January 24, 2014
26. Accounts payable payment packets
27. Add-on earnings by account report, 2013-14
28. Consultant services agreement, approved June 11, 2013
29. Budget calendar
30. Collective bargaining agreement with CSEA, July 1, 2013 to June 30, 2016
31. Collective bargaining agreement with KCJUHSD Teachers' Association, July 1, 2013 to June 30, 2014
32. Draft multiyear financial recovery plan 2012-13 to 2017-18, March 2013
33. Employee handbook, December 2013
34. Matrix of CSBA Masters in Governance module completion, January 6, 2014
35. Monthly budget reports presented to the board
36. Monthly cash flow reports presented to the board
37. Revenue and expenditure reports presented to the board
38. Salary projection by account report, 2013-14
39. Staffing report by account, 2013-14
40. Position control reports, 2013-14
41. Statements of Economic Interests Form 700, 2012-13
42. CALPADS 1.17 report, 2013-14
43. CALPADS Fall 1 data collection from CSIS, 2012-13

44. Daily apportionment report by month, 2013-14 months 1 through 4 for both comprehensive high schools
45. Gain and loss reports, samples all schools
46. Independent study monthly reports, samples all schools
47. Attendance instructions to staff for leave categories
48. Tentative monthly ADA schedule, 2013-14
49. Grading schedule, 2013-14
50. Aeries support team training schedule, 2013-14
51. Aeries support team sign-in sheets and agenda: November 25, 2013, April 10, 2013, and March 6, 2013
52. Tasks for attendance listing showing daily, weekly and monthly reports to run
53. Electronic attendance in Aeries, July 9, 2010 from Eagle Software screen prints and instruction document
54. Sample truancy letters
55. Truancy arrests, August 12, 2013 through February 13, 2014
56. Attendance/truancy parent meeting sign-in sheet, January 16, 2014
57. List of students on warning list, comprehensive high schools
58. List of truancy letters, Greenfield High School
59. Samples of ASB meeting minutes and supporting documentation
60. Sample budget development sheet for fundraising event and administrative approval, October 22, 2013
61. Sample emails from business manager to school sites regarding ASB matters
62. ASB operations assignment of duties to school site personnel
63. ASB procedures listing to ASB staff from business manager for ASB transactions and check authorization
64. ASB annual club information sheet

65. ASB/Leadership minutes, May 10, 2013, Greenfield High School
66. ASB training follow-up meeting notes, October 3, 2013
67. ASB club advisor meeting agenda, November 13, 2013
68. ASB coin and currency count sheet and supporting documentation sample, February 3, 2014
69. ASB payment and supporting documentation for FFA purchase, September 27, 2013
70. Technology and maintenance/operations work orders, July 1, 2013 through January 7, 2013
71. Emails from information technology director regarding Odysseyware and Aeries
72. Computer inventory SMCJUHSD, 2013 by school site
73. Technology purchasing procedures
74. SMCJUHSD Technology Policies & Procedures Manual
75. SMCJUHSD Technology Plan, 2013-2016
76. E-Rate quarterly reports
77. District response to 2012-13 food service audit findings
78. List of training provided by business manager, 2012-13 and 2013-14
79. Correspondence from CDE regarding the school nutrition programs audit 2011-12 and approval, September 24, 2013
80. Correspondence from CDE regarding increase in funding for Six Cents program, October 10, 2013
81. Website menus, January and February 2014
82. Correspondence from CDE regarding resolution to whistleblower complaint, January 14, 2014
83. CDE complaint report, August 1, 2013
84. Samples of state and federal reimbursements, 2013-14

85. Certificate of achievement, Spring 2013, for successful completion of 2012-13 annual mandatory training for school nutrition program sponsors
86. SMCJUHSD food service daily sales recap, August 8, 2013 through January 28, 2014
87. Memorandum, Monterey Educational Risk Management Authority, statistical report for workers' compensation, January 8, 2014
88. Total Compensation Systems, Inc. report for other post-employment benefits, 2010
89. Keenan and Associates property & liability report , June 14, 2013
90. Keenan and Associates hazardous materials report, survey and inventory, July 22, 2013

Table of Financial Management Ratings

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
1.1	<p>PROFESSIONAL STANDARD – INTERNAL CONTROL ENVIRONMENT</p> <p>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)</p>	1	2	2	2	4
1.3	<p>PROFESSIONAL STANDARD – INTERNAL CONTROL ENVIRONMENT</p> <p>The organizational structure clearly identifies key areas of authority and responsibility. Reporting lines in each area are clearly identified and logical. (SAS-55, SAS-78)</p>	3	4	4	4	5
2.1	<p>PROFESSIONAL STANDARD – INTER- AND INTRADEPARTMENTAL COMMUNICATIONS</p> <p>The business and operational departments communicate regularly with internal staff and all user departments on their responsibilities for accounting procedures and internal controls. Communications are written when they affect many staff or user groups, are issues of importance, and/or reflect a change in procedures. Procedures manuals are developed. The business and operational departments are responsive to user department needs.</p>	0	3	4	4	4
2.3	<p>PROFESSIONAL STANDARD – INTER- AND INTRADEPARTMENTAL COMMUNICATIONS</p> <p>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.</p>	1	4	4	4	5

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
3.1	<p>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.</p>	1	1	1	1	4
3.2	<p>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.</p>	0	1	1	2	2
5.1	<p>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.</p>	2	4	4	4	3
5.2	<p>PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.</p>	3	3	3	3	4

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
5.3	<p>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.</p>	2	3	3	3	4
5.4	<p>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.</p>	1	1	1	0	3
6.1	<p>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))</p>	2	5	8	9	10

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
6.2	<p>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))</p>	2	6	8	5	7
6.3	<p>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.</p>	3	6	6	6	7
7.2	<p>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.</p>	2	3	3	3	4
7.3	<p>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.</p>	1	4	5	5	7
8.1	<p>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.</p>	1	2	3	3	5

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
8.2	<p>PROFESSIONAL STANDARD – ACCOUNTING</p> <p>The LEA's payroll procedures comply with the requirements established by the county office of education, unless the LEA is fiscally independent. (EC 42646) Per standard accounting practice, the LEA implements procedures to ensure timely and accurate payroll processing.</p>	2	4	3	3	4
9.2	<p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</p> <p>School sites maintain an accurate record of daily enrollment and attendance that is reconciled monthly. School sites maintain statewide student identifiers and reconcile data required for state and federal reporting.</p>	3	4	4	4	5
9.3	<p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</p> <p>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.</p>	1	1	2	2	5
9.4	<p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</p> <p>Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.</p>	3	4	4	4	5
9.6	<p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</p> <p>The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.</p>	1	6	7	7	6
9.7	<p>PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING</p> <p>School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.</p>	1	5	5	6	7

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
10.4	<p>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.</p>	2	2	2	1	4
10.5	<p>PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING The LEA has adequate purchasing and warehousing procedures to ensure that: (1) only properly authorized purchases are made, (2) authorized purchases are made consistent with LEA policies and management direction, (3) inventories are safeguarded, and (4) purchases and inventories are timely and accurately recorded.</p>	1	1	1	1	3
11.1	<p>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)</p>	0	0	1	2	2
11.3	<p>LEGAL STANDARD – STUDENT BODY FUNDS The LEA provides annual training and ongoing guidance to site and LEA personnel on the policies and procedures governing Associated Student Body accounts. Internal controls are part of the training and guidance, ensuring that any findings in the internal audits or independent annual audits are discussed and addressed so they do not recur.</p>	0	0	0	2	4

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
12.1	<p>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)</p>	1	3	4	4	5
12.2	<p>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)</p>	1	4	4	4	5
14.1	<p>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)).</p>	1	4	3	2	3
14.2	<p>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)</p>	1	4	4	3	4

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
14.3	<p>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.</p>	2	6	6	7	8
15.2	<p>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.</p>	3	4	5	6	7

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
15.3	<p>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.</p>	0	1	1	1	4
15.7	<p>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.</p>	0	0	2	4	6
15.8	<p>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.</p>	0	0	1	2	4

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
16.1	<p>LEGAL STANDARD – MAINTENANCE AND OPERATIONS FISCAL CONTROLS</p> <p>Capital equipment and furniture is tagged as LEA-owned property and inventoried at least annually.</p>	0	1	2	3	4
17.1	<p>PROFESSIONAL STANDARD – FOOD SERVICE FISCAL CONTROLS</p> <p>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.</p>	5	0	1	1	6
20.1	<p>PROFESSIONAL STANDARD – SPECIAL EDUCATION</p> <p>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.</p>	1	3	4	4	4
21.1	<p>PROFESSIONAL STANDARD – TRANSPORTATION</p> <p>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.</p>	3	3	3	4	5
22.1	<p>LEGAL STANDARD – RISK MANAGEMENT – OTHER POST EMPLOYMENT BENEFITS</p> <p>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)</p>	4	5	6	6	5

Financial Management Standards	February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
<p>PROFESSIONAL STANDARD – RISK MANAGEMENT – OTHER POST EMPLOYMENT BENEFITS</p> <p>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.</p>	2	3	4	4	2
Collective Average Rating	1.54	2.93	3.39	3.54	4.76

The collective average ratings for all years are based on the subset of priority standards used beginning with the second 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)

Summary of Fourth Comprehensive Review, March 2013

The district had not yet updated plans regarding emergency and disaster preparedness and had made no progress on this standard.

Summary of Fifth Comprehensive Review, June 2014

The district updated Board Policy 3516, Emergencies and Disaster Preparedness, demonstrated evidence of emergency preparedness training, and developed its emergency preparedness plan.

Findings

1. King City High School and Greenfield High School held staff meetings to discuss and approve new school site safety plans.
2. King City High School and Greenfield High School site councils held staff meetings to discuss and adopt comprehensive emergency preparedness plans. Evacuation plans were posted on each multipurpose room wall.
3. The team interviewed each high school site principal, and each demonstrated knowledge of the policies, administrative regulations and site evacuation plans. The state administrator complied with developing and maintaining the 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, as required by the district's board policy.
4. The district's emergency preparedness plan was updated in November 2013. The plan includes all elements identified in the updated board policy. The plan's emergency contact information has been corrected to include all staff.
5. The district developed an accountability form that validates that each principal has acknowledged the policies and procedures for the emergency preparedness plan. The form also includes authorized signatures from each school site council.
6. The emergency preparedness plan has been communicated to staff and parents at each high school.

7. Staff at both high schools have participated in developing and implementing the plan, including mock training drills at each site.

Recommendations for Recovery

The district should:

1. Continue to update its emergency preparedness plan, following Board Policy and Administrative Regulation 3516, and ensure that the information included is current and accurate.
2. Continue to update its comprehensive safety plan and Board Policy and Administrative Regulation 0450 as needed.
3. Continue to ensure that all site administrators attend professional development training in emergency and disaster response.
4. Ensure that each site maintains an up-to-date emergency preparedness plan that is specific to the site, 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 Fully Implemented

February 2010 Initial Rating: 2

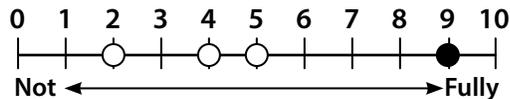
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 9

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

The district had not developed a comprehensive districtwide safety plan. The district was providing various types of safety training for its employees, but had no coordinated or comprehensive plan for employee safety training. There was newly implemented online safety training through the human resources department, as well as some safety training provided by outside vendors and consultants.

Summary of Fifth Comprehensive Review, June 2014

The district has developed a comprehensive districtwide safety plan. The district provided various types of safety training for its employees and has an online schedule of events for all staff through the human resources department. Additional professional development training is provided through the Nor Cal Relief Property and Liability Joint Powers Authority.

Findings

1. Board Policy and Administrative Regulation 0450, regarding a comprehensive school safety plan, were adopted in June of 2012.
2. The district has 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. The policy defines the requirements of the plan, which include a review and update by March 1 of each fiscal year, as well as board review and approval.
3. Board Policy 3516, regarding emergencies and a disaster preparedness plan, was updated in January 2011. The policy requires the state administrator 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 last update to the district's emergency preparedness plan was January 12, 2011.
4. Employees have received training in hazardous chemical safety, fire extinguisher safety and forklift safety. Employees are also receiving electrical safety and ladder safety training as part of the online training provided through the human resources department.
5. Material safety data sheet (MSDS) safety training was provided through the online program provided by the human resources department on December 2, 2013.

Recommendations for Recovery

The district should:

1. Continue to update and implement any relevant changes to the comprehensive school safety plan as outlined in Board Policy and Administrative Regulation 0450 to ensure adherence to legal and compliance requirements.
2. Establish a district safety committee to help develop and support safety plans.
3. Establish site safety committees and ensure that they meet regularly to review and communicate school safety issues and update the safety plan accordingly.

Standard Partially Implemented

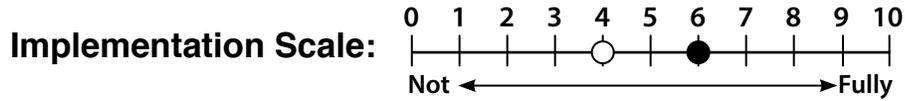
February 2010 Initial Rating: 4

March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 6



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)

Summary of Fourth Comprehensive Review, March 2013

The district reorganized the supervision of the custodial, maintenance, and grounds keeping personnel under the school principals, and some new work schedules were implemented. The cleanliness of the school campuses had improved considerably in the past year.

Summary of Fifth Comprehensive Review, June 2014

The team inspected each high school campus, including classrooms, gymnasiums, cafeterias, and all exterior premises. The district employs one groundskeeper and maintenance position at each site. There are no day custodians, and the maintenance personnel communicate with the site principals regarding any emergency issues or daily concerns.

Findings

1. The district continues to give the principals and the maintenance, operations and transportation (MOT) supervisor shared responsibility for overseeing and evaluating the custodial and groundskeeping personnel at the high schools. The maintenance personnel are supervised by the MOT supervisor.
2. The MOT supervisor is responsible for developing work assignments or work schedules for personnel at the high school campuses. However, because of the limited number of staff, personnel are often redirected by the school site principal.
3. King City High School and Greenfield High School continue to show dramatic improvement in cleanliness. All areas of both campuses, including but not limited to play fields and perimeter fencing, have improved since prior reviews.
4. The district has completed professional development training for integrated pest management.
5. Sanitary deficiencies noted on the Williams Facilities Inspection Tool (FIT) continue to be corrected regularly, and no known issues were observed.
6. The first quarterly FIT report, dated October 2013 by the Monterey County Office of Education, rated both Greenfield High School and King City High School as in good repair with no items in need of emergency attention.
7. The MOT supervisor conducts weekly walk-through site visits.

8. The fencing along the northern perimeter of Greenfield High School has periodic breaks or openings that allow students to enter or exit the campus.

Recommendations for Recovery

The district should:

1. Continue to conduct regular walk-through site visits at each campus, and ensure that communication between site administrators and the director of MOT includes items or areas that need maintenance and repair.
2. Continue to implement custodial standards, including professional development training and accountability for all personnel.
3. Continue to review the maintenance and groundskeeping schedules, workload and work completed to identify potential productivity improvements. Review additional duties for the groundskeeping personnel, such as intermittent bus driving responsibilities, to offset the loss of staff productivity.
4. Follow up on training for integrated pest management and develop a districtwide plan for this.
5. 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 Fully Implemented

February 2010 Initial Rating: 3

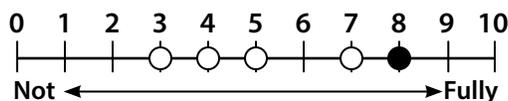
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



1.9 School Safety

Legal Standard

The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)

Summary of Fourth Comprehensive Review, March 2013

The district had not fully implemented its Injury and Illness Prevention Plan (IIPP). The district was providing some regular safety training in accord with the plan, and some regular safety inspection was occurring as recommended in the plan.

Summary of Fifth Comprehensive Review, June 2014

The Injury Illness and Prevention Plan (IIPP) has been fully implemented and is available to all staff and community members on the district's website.

Findings

1. Training verification forms have been completed acknowledging awareness of the IIPP; however no safety meeting reports are on file. The district uses the facility planning committee as a dual-purpose committee and incorporates safety issues as part of the regular meeting. The district needs a separate districtwide safety committee.
2. Employees continue to receive safety training in the use of hazardous chemicals, fire extinguishers, and forklifts. Employees also receive electrical safety and ladder safety training online through the human resources department. Other available trainings include blood-borne pathogens exposure prevention, MSDS, and slips, trips and falls.
3. The district's facilities are inspected once per year by Keenan & Associates as part of the Monterey County Schools Insurance Group Joint Powers Authority (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. No unsafe conditions were indicated in the first quarterly report.
4. Keenan & Associates completed a hazardous materials inspection of the district on June 22, 2013. The inspection helps the district control costs, reduce regulatory burdens for maintaining MSDS, minimize waste disposal cost, and reduce stored materials. The district is in compliance with Title 8 of the Hazardous Communication Regulations and Title 24 of part 9 of the California Uniform Fire Code.

Recommendations for Recovery

The district should:

1. Continue to implement the IIPP as adopted, and amend the plan as needed to address any compliance issues.

2. Update its website and communicate to all employees that the IIPP is in effect and its importance to the district and employees.
3. Request that the human resources department continue to expand the number of online IIPP-related safety trainings available to employees.
4. Develop a districtwide schedule for the MOT supervisor to conduct a comprehensive school safety inspection at least twice per year. The inspection should include the site administrator or assistant principal.

Standard Fully Implemented

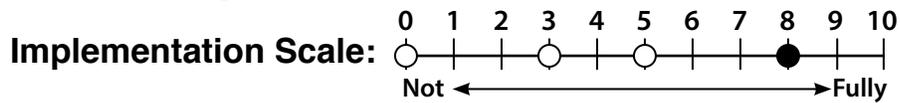
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 8



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)

Summary of Fourth Comprehensive Review, March 2013

The district continued to adequately update and maintain the MSDS binders and provide regular training regarding their use.

Summary of Fifth Comprehensive Review, June 2014

The district continues to update and maintain its MSDS binders and provides employees with regular online training in their use.

Findings

1. Board Policy and Administrative Regulation 3514.1, regarding material safety data sheets, were adopted in March 2013.
2. The district continues to update and maintain its MSDS binders and provides employees with regular online training in their use.
3. MSDS binders at King City High School included updates for the 2013-14 fiscal year.

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 provide professional development training for all staff regarding proper handling of materials.

Standard Fully Implemented

February 2010 Initial Rating: 1

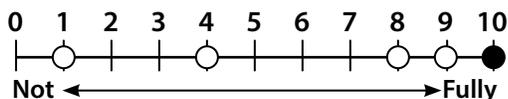
March 2011 Rating: 4

March 2012 Rating: 8

March 2013 Rating: 9

June 2014 Rating: 10

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district was adequately maintaining the key control procedure it implemented. There was still some difficulty retrieving keys from staff members.

Summary of Fifth Comprehensive Review, June 2014

The district implemented key control procedures and updated its board policy in this area.

Findings

1. The key issuance maintenance log is maintained by the MOT supervisor.
2. The MOT supervisor provides oversight for the district's key issuance policy and procedures. Site administrators are maintaining key control procedures at school sites.

Recommendation for Recovery

The district should:

1. Continue to communicate board policy, administrative regulations and key issuance procedures to all administrators and staff.

Standard Fully Implemented

February 2010 Initial Rating: 2

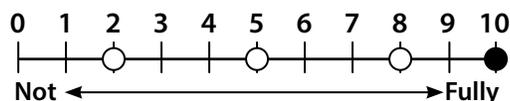
March 2011 Rating: 5

March 2012 Rating: 8

March 2013 Rating: 8

June 2014 Rating: 10

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The exterior parking lot lighting at Greenfield High School was repaired. The lighting at both high school campuses had improved significantly and was satisfactory. The district planned to complete additional lighting improvements at King City High School.

Summary of Fifth Comprehensive Review, June 2014

The lighting at both high school campuses has improved significantly and is satisfactory.

Findings

1. The FIT evaluation conducted by the Monterey County Office of Education in 2013 identified no major issues with lighting at Greenfield or King City High Schools. Minor issues included missing diffusers, light bulbs and similar items.
2. The district's 2013 first interim financial report includes an allocation of \$350,000 for deferred maintenance projects. Additional lighting projects for Greenfield High School include new lights and ballasts for the library.
3. Pacific Gas and Electric company (PG&E) provides energy rebate programs for K-12 school districts for certain improvements such as lighting retrofits, or heating, ventilation and air conditioning (HVAC) projects.

Recommendations for Recovery

The district should:

1. Continue to review and develop additional plans to maintain and repair campus lighting as needed.
2. Continue to meet with representatives from PG&E to review any energy rebates available for district projects.
3. Review Proposition 39 funding in its 2013-14 budget to align any lighting projects with its five-year deferred maintenance plan.

Standard Fully Implemented

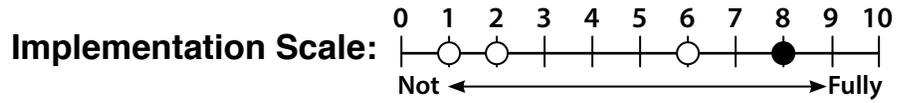
February 2010 Initial Rating: 1

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

The district had not developed a comprehensive districtwide safety plan. The district provided various types of safety training for its employees but had no coordinated or comprehensive plan for employee safety training. There was newly implemented online safety training through the human resources department, and some safety training was provided by outside vendors and consultants.

Summary of Fifth Comprehensive Review, June 2014

The district has developed comprehensive districtwide safety plans that include disaster preparedness and injury and illness prevention plans. The district has provided various types of online safety training for its employees, conducted by the human resources department.

Findings

1. Board Policy and Administrative Regulation 0450, regarding a comprehensive safety plan, were adopted on June 27, 2012.
2. Board Policy 0450 requires 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 meeting the requirements of this policy.
3. The district does not have a districtwide safety committee to help develop and maintain the comprehensive school safety program.
4. Board Policy 3516, regarding an emergencies and disaster preparedness plan, was updated in January 2011. This policy requires the state administrator 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 has met this requirement.

Recommendations for Recovery

The district should:

1. Designate the MOT supervisor to be responsible for the formation of a comprehensive employee safety program and committee in accordance with Board Policy 0450.

- Schedule comprehensive school safety inspections at least two times per year with each site administrator.

Standard Partially Implemented

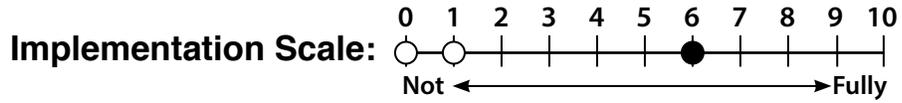
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 6



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)

This standard is no longer applicable under current law and will be eliminated from the evaluation process and scoring rubric.

Summary of Fourth Comprehensive Review, March 2013

The district had made little progress on this standard since the last review. The district still had not inventoried its buildings, identified which buildings were nonconforming, or obtained waivers for their continued use. Previous recommendations had not been implemented.

Fifth Comprehensive Review

This standard is no longer applicable under current law and will be eliminated from the evaluation process and scoring rubric.

Standard Partially Implemented

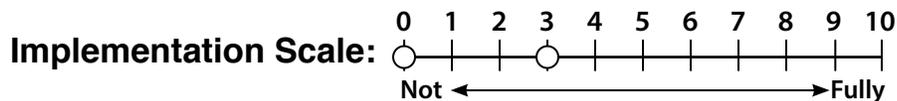
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: N/A



2.3 Facility Planning

Professional Standard

The LEA has established and uses a selection process to choose licensed architectural/engineering services. (GC 4525-4526)

Summary of Fourth Comprehensive Review, March 2013

There had been no new projects requiring the services of an architect since the previous review. The district was still using its current architect to close out projects it started previously with that architectural firm.

Summary of Fifth Comprehensive Review, June 2014

The district adopted Board Policy 7140 and corresponding administrative regulations for selecting architectural services. The district meets the requirements of this standard in accordance with Government Code sections 4525-4526.

Findings

1. The district adopted Board Policy 7140 and corresponding administrative regulations for selecting architectural services.
2. The district has not started any new facility projects since the last review. The district is using the services of NTD Architecture for current projects. The MOT supervisor indicated that any future capital projects will require a request for proposals to meet policy requirements.

Recommendation for Recovery

The district should:

1. Continue to follow the board policy as adopted.

Standard Fully Implemented

February 2010 Initial Rating: 1

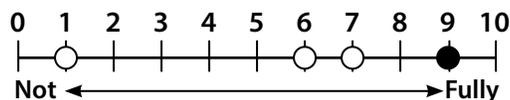
March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 9

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.

Summary of Fourth Comprehensive Review, March 2013

There had been no update to the School Facilities Master Plan. The School Facilities Master Plan needed to be updated to include the completion of the King City High School modernization project.

Summary of Fifth Comprehensive Review, June 2014

The district has a long-range facility master plan completed by TSS consultants in February 2011. Changes to the capital planning budget for facilities projects are currently in process to include additional funds.

Findings

1. The district has not updated its School Facilities Master Plan since its completion in February 2011 because of a lack of funding and future projects. Budget amounts in the facilities master plan are now being reviewed for inclusion in the district's second interim financial report.
2. The lack of state and local funding has prevented the district from completing any additional projects.
3. The district is changing its capital planning budget to include an additional \$350,000 for deferred maintenance projects.
4. The district anticipates that it will receive \$1,888,121 in emergency repair funds for King City High School and \$78,696 for Greenfield High School. This funding was tentative at the time of this review, and more information regarding emergency repair funds will be made available in the governor's May budget revision.

Recommendations for Recovery

The district should:

1. Review and update its School Facilities Master Plan to show the completion of projects identified in the master plan, including modernization projects completed during the 2012-13 fiscal year at King City High School.
2. Regularly review the master plan to ensure its accuracy and to identify and add new projects and their costs.

3. Include capital planning funds in the district's budget to complete projects identified in the facilities master plan.

Standard Fully Implemented

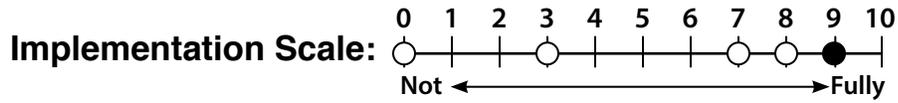
February 2010 Initial Rating: 0

March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9



2.8 Facility Planning

Professional Standard

The LEA has a facility planning committee.

Summary of Fourth Comprehensive Review, March 2013

The district's facility advisory committee had met four times since the previous review. The committee was meeting regularly and was maintaining attendance documentation.

Summary of Fifth Comprehensive Review, June 2014

The district's facility advisory committee continues to meet quarterly to review current and future building projects. The district has allocated \$350,000 for deferred maintenance projects that were reviewed by the committee.

Findings

1. The district's facilities planning committee met four times since the last review by FCMAT: September 2012, December 2012, March 2013, and June 2013.
2. Committee members include one board member, the state administrator, two assistant principals, four community members, one student representative, and the business manager.
3. The district changed the name of the committee from the facilities advisory committee to the facilities planning committee to comply with this standard.

Recommendation for Recovery

The district should:

1. Continue to ensure that the committee meets regularly, is representative of the district's constituents, and has published agendas and minutes.

Standard Fully Implemented

February 2010 Initial Rating: 0

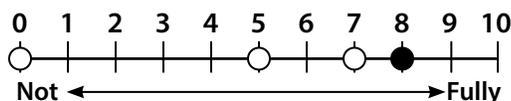
March 2011 Rating: 0

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



3.1 Facilities Improvement and Modernization

Legal Standard

The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)

Summary of Fourth Comprehensive Review, March 2013

The district had almost completed its modernization project at King City High School and had received approval from the Office of Public School Construction (OPSC) to spend the remaining funds on additional modernization projects at that site. The district had not updated its five-year deferred maintenance plan since 2009-10.

Summary of Fifth Comprehensive Review, June 2014

The district completed its modernization project at King City High School and received approval from the Office of Public School Construction (OPSC) to spend the remaining funds on additional modernization projects at that site. The district updated its five-year deferred maintenance plan and allocated \$350,000 for projects in the 2013-14 fiscal year.

Findings

1. The district has a five-year deferred maintenance plan that was adopted in fiscal year 2013-14 and includes \$350,000 in funding.
2. The district has applied for and received an unfunded approval for a grant from the state's Emergency Repair Program (ERP). The district anticipates receiving \$1,888,121 in emergency repair funds for King City High School and \$78,696 for Greenfield High School. These funds are tentative at this time; more information regarding ERP funding will be made available in the governor's May budget revision.

Recommendations for Recovery

The district should:

1. Although it is no longer legally required, update the five-year deferred maintenance plan to evaluate and determine current needs in case state funding becomes available for maintenance projects.
2. Complete deferred maintenance projects identified in its recently completed five-year deferred maintenance plan.
3. Review its approved ERP application to incorporate this funding with deferred maintenance projects if funding becomes available in 2014-15.

3.3 Facilities Improvement and Modernization

Legal Standard

All relocatable buildings in use meet statutory requirements. (EC 17292)

Summary of Fourth Comprehensive Review, March 2013

The architectural firm the district hired to help assess its relocatable buildings had not completed the project. The Division of the State Architect's (DSA's) records and the district's records for many buildings were difficult to locate.

Summary of Fifth Comprehensive Review, June 2014

The district's architect completed a building inventory and did not identify any nonconforming buildings.

Findings

1. The district's architect, NTD Architecture, completed a building inventory and did not identify any nonconforming buildings under Education Code section 17292.
2. The district has not validated the statutory requirements under Education Code section 17292 to determine if the announcer's booths on the home and visitors' sides of the bleachers at King City High School meet these requirements.
3. The district retained the services of an architectural firm to prepare the 1-A or 3-A documentation needed to pursue and obtain state approval of any relocatable buildings that do not meet statutory requirements.
4. The architect contracted by the district has closed out all DSA files (nine total) without DSA certification because of incomplete paperwork. Only one building remains in question.
5. The district has no permanent toilet facilities at the Greenfield High School stadium.

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. Complete comprehensive documenting 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.

4. Develop a plan to construct permanent toilet facilities at the Greenfield High School stadium.

Standard Partially Implemented

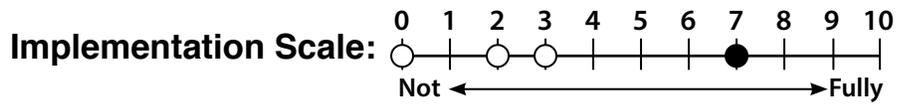
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 7



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.

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.

Summary of Fifth Comprehensive Review, June 2014

Although the district is no longer required to submit a five-year deferred maintenance plan and capital budget, the district should update its five-year deferred maintenance plan to evaluate and determine building needs.

Findings

1. Because of amendments in the Budget Act in 2009-10 AB X4, and more recently the Local Control Funding Formula (LCFF), districts are no longer required to submit a five-year deferred maintenance plan and capital budget.
2. The district has allocated \$350,000 to fund projects listed on its deferred maintenance plan.

Recommendation for Recovery

The district should:

1. Review and update its five-year deferred maintenance plan annually to determine building needs and to provide a framework for future planning as funding becomes available from sources such as ERP.

Standard Fully Implemented

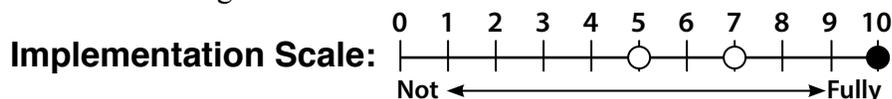
February 2010 Initial Rating: 5

March 2011 Rating: 5

March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 10



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.

Summary of Fourth Comprehensive Review, March 2013

The director of the maintenance, operations, transportation, and facilities (MOTF) department took further steps to strengthen his knowledge of OPSC and DSA processes.

Summary of Fifth Comprehensive Review, June 2014

The MOT supervisor and business manager are knowledgeable regarding building programs and funding from OPSC and requirements of the DSA.

Findings

1. The district contracts with NTD Architecture to augment services needed for OPSC and DSA programs and to help administer its modernization projects, new construction and other state building programs.

Recommendation for Recovery

The district should:

1. Ensure that the MOT supervisor and business manager continue to review building programs provided by OPSC, and regularly review DSA requirements with the district's architect.

Standard Fully Implemented

February 2010 Initial Rating: 0

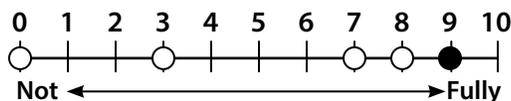
March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

The district was planning additional modernization projects at King City High School, to be managed by a professional construction management firm, with the director of MOTF as the primary liaison for the district. The district reduced the MOTF technician's hours, which reduced the time the director could be available to manage construction projects.

Summary of Fifth Comprehensive Review, June 2014

The district contracts with Kitchell Management Services to provide construction management, value engineering, and constructability reviews for all current and future building projects.

Findings

1. The district completed its modernization project at King City High School during the 2012-13 fiscal year with the assistance of Kitchell Management Services.
2. Additional modernization projects at all sites will continue to use the construction management firm contracted for the initial project.
3. The district has reduced the technician position in the MOT department to 16 hours per week, which has reduced the amount of time the supervisor is available to manage construction, deferred maintenance and ongoing maintenance projects.

Recommendations for Recovery

The district should:

1. Continue to outsource construction management on large building projects as needed to ensure proper oversight and expertise.
2. Continue to provide training for the MOT supervisor to strengthen his expertise in school construction and help ensure effective management of construction projects.
3. Evaluate the feasibility of adding clerical hours to help the MOT supervisor manage the department.

Standard Fully Implemented

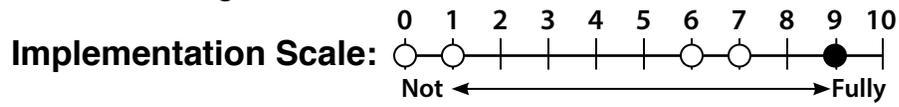
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 9



4.2 Construction of Projects

Professional Standard

The LEA maintains appropriate project records and drawings.

Summary of Fourth Comprehensive Review, March 2013

The MOT technician position was reduced to two days per week, resulting in a lack of improvement in the organization of the district's construction and maintenance records.

Summary of Fifth Comprehensive Review, June 2014

The district maintains all project records and as-built drawings and is completing its building inventory with NTD Architecture..

Findings

1. The district has located as-built drawings and records related to its building projects.
2. The district's architect is developing a building inventory consisting of 1-A and 3-A drawings. The goal for the building inventory includes digitizing all records and drawings for future use

Recommendations for Recovery

The district should:

1. Continue to review and organize all of its building project records.
2. Require that all contractors and design professionals involved in construction projects provide it with a full set of digitized plans and records pertaining to the project.
3. Consider using temporary clerical assistance for the MOT department to organize and file records in order to remove the current backlog.

Standard Partially Implemented

February 2010 Initial Rating: 2

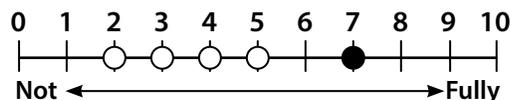
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 4

June 2014 Rating: 7

Implementation Scale:



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.

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 had not been regularly updated to include items purchased and surplus within the past year. The custodial inventory was monitored and maintained adequately.

Summary of Fifth Comprehensive Review, June 2014

Staff indicated that they have adequate equipment and supplies to accomplish their duties, except for specialized equipment that would not be cost-effective for the district to own. The district does not maintain an adequate inventory of vehicles used by maintenance and grounds personnel.

Findings

1. The MOT supervisor 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).
2. The district does not maintain adequate inventory records for each vehicle used by maintenance and groundskeeping personnel.
3. The district reduced the MOTF technician position's hours to approximately 16 hours per week. This position is responsible for maintaining inventory and maintenance files and records.
4. The district's equipment inventory and fixed asset inventory was updated on January 16, 2014 to include items purchased and surplus since the last commissioned inventory.

Recommendations for Recovery

The district should:

1. Continue to update its fixed asset and small equipment inventory annually.
2. Update its fixed asset inventory whenever assets are purchased or surplus.

- Continue using inventory controls and adhering to district policies and procedures for purchasing and using equipment, tools, supplies and materials.

Standard Fully Implemented

February 2010 Initial Rating: 1

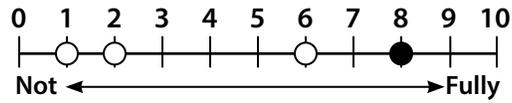
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 8

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

Performance evaluations for MOTF department staff were completed in a timely manner. Custodial standards were successfully implemented. Work standards for maintenance and grounds positions had not been developed.

Summary of Fifth Comprehensive Review, June 2014

Evaluations in the MOT department were completed in a timely manner.

Findings

1. Performance evaluations for MOT department staff were completed in a timely manner for the 2012-13 fiscal year.
2. The MOT supervisor completes evaluations for the maintenance staff, and evaluations of the custodial and groundskeeping staff are completed jointly by the MOT supervisor and the school site principals. The school site principals work closely with the MOT supervisor on the evaluations of the custodians and groundskeeping staff at their respective sites

Recommendation for Recovery

The district should:

1. Continue to review and complete all employee evaluations annually or in accordance with the requirements of the relevant collective bargaining agreement.

Standard Fully Implemented

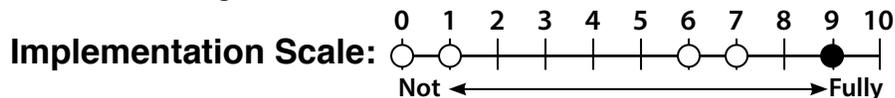
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 9



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.

Summary of Fourth Comprehensive Review, March 2013

The district placed supervision of custodial, maintenance and grounds workers under the school principals, with input from the director of MOTF. The principals had authority to modify work schedules to fit the needs of their campuses. The district had not developed work standards for the maintenance or grounds worker positions.

Summary of Fifth Comprehensive Review, June 2014

With supervision of custodial and grounds workers shared by school principals and the MOT supervisor, principals have authority to modify work schedules to fit the needs of their campuses. The district has developed work standards for the maintenance and grounds worker positions.

Findings

1. The district has developed work standards for maintenance and grounds worker positions.
2. The site principals, working closely with the MOT supervisor, have the authority to modify the work schedules developed by the MOT supervisor. This has affected the productivity of the MOT staff in meeting their daily, weekly and monthly job requirements.
3. Job descriptions for the maintenance and grounds worker positions have not been modified to include supervision by the school principals. To modify these job descriptions, the district would need to meet with representatives of California State Employees Association (CSEA).

Recommendations for Recovery

The district should:

1. Develop and maintain a process to periodically review and update job descriptions to accommodate changes in procedures, duties and needs.
2. Update the job descriptions for the maintenance and grounds worker positions to include supervision by the school principal. Meet with representatives of the CSEA to accomplish this.

Standard Fully Implemented

February 2010 Initial Rating: 2

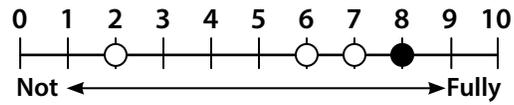
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



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.

Summary of Fourth Comprehensive Review, March 2013

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 Fifth Comprehensive Review, June 2014

The district has a written five-year preventive and deferred maintenance plan and has updated its schedule for repairing or replacing fixed asset equipment. The district is implementing the School Dude maintenance software system.

Findings

1. The district has a written five-year preventive and deferred maintenance plan. The preventive maintenance plan and deferred maintenance plan are combined in one document to serve both deferred and general maintenance planning requirements.
2. The district has updated its schedule for repairing or replacing fixed asset equipment.
3. The district is implementing School Dude maintenance software to monitor, track and record work orders. The software can help the district improve timely responses and determine projects' costs and feasibility. The School Dude work order system will allow district staff to report and log items that require maintenance.
4. The district has allocated \$350,000 for current maintenance projects and may receive additional funding from the ERP.
5. School principals indicate that work orders are completed on time and there are no outstanding issues.
6. The district has developed a written plan to address ongoing painting; heating, ventilation and air conditioning (HVAC) maintenance; equipment servicing, except for buses; and other such items. The maintenance worker's schedule includes only tasks from work orders.

Recommendation for Recovery

The district should:

1. Continue to update and develop a comprehensive and proactive preventive maintenance plan that includes funding, service intervals, long-term repairs, replacement, and new funding sources such as ERP.

Standard Partially Implemented

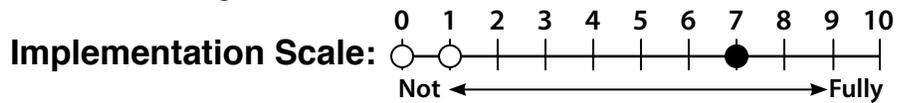
February 2010 Initial Rating: 0

March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 7



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.

Summary of Fourth Comprehensive Review, March 2013

The district developed an inventory of its equipment, vehicles and facilities. The equipment inventory had not been regularly updated in the past year. The district had begun developing a vehicle replacement plan and had removed five vehicles and four buses from service.

Summary of Fifth Comprehensive Review, June 2014

The district updated its inventory of equipment, vehicles and facilities. The district has developed a vehicle replacement plan.

Findings

1. The district identified nearly \$2 million in repairs that qualify and were approved for the state's Emergency Repair Program (ERP) in May 2011. However, no state funds are available and the approval remains unfunded. It is anticipated that the state will begin funding projects on the approved but unfunded list during the 2014-15 fiscal year.
2. The district has updated its vehicle and bus replacement plan for both its white and yellow fleet vehicles, and a fixed asset equipment inventory. The district has also updated its inventory of facilities.

Recommendation for Recovery

The district should:

1. Regularly update its equipment inventory and vehicle replacement plan.

Standard Partially Implemented

February 2010 Initial Rating: 0

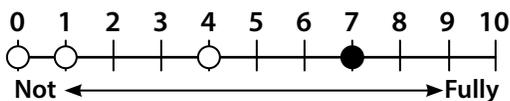
March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 7

Implementation Scale:



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)

Summary of Fourth Comprehensive Review, March 2013

The district had not developed a plan to ensure the equality and equity of all of its school facilities. The district had recently completed a large modernization project that improved the facilities at King City High School. The district was creating a foundation with the goal of raising funds for capital improvements.

Summary of Fifth Comprehensive Review, June 2014

The district has incorporated a plan for ensuring the equity of its school sites into its school facilities planning committee process. As part of its equity planning the district recently completed a major modernization project at King City High School.

Findings

1. The district recently completed a comprehensive modernization of the gymnasium and locker facilities at King City High School.
2. 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.
3. The facilities master plan contains a project list that is based in part on "an examination of equity among schools at each grade level."
4. The district has incorporated a plan to ensure the equity of its school sites into its facilities planning committee process. The district's facilities planning committee, consisting of school district administrators and community members, has met regularly over the past year to discuss facilities issues, and regularly discusses the issue of equity between school sites.

Recommendations for Recovery

The district should:

1. Continue to include plans to ensure equity between its school sites in its regular review and planning with the facilities planning committee.
2. Complete the projects identified in its ERP application to ensure continuing equity in the quality of its school sites.

Standard Partially Implemented

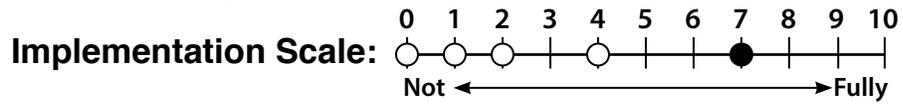
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 7



8.2 Community Use of Facilities

Professional Standard

The LEA has a plan to promote community involvement in schools.

Summary of Fourth Comprehensive Review, March 2013

The facilities advisory committee had met regularly over the past year. The state administrator was creating a foundation to promote community involvement in the district. The district's facilities were being used frequently by the public, and the condition of the campuses had improved. The district still had no written plan to promote community involvement in the schools.

Summary of Fifth Comprehensive Review, June 2014

The district began discussions in 2013-14 to develop additional plans to promote and communicate community involvement in schools. Community groups continue to help the district with joint projects. The district continues to make all donor groups aware that regulatory agencies such as DSA or OPSC have compliance issues with the construction of concession stands or other facilities.

Findings

1. The district began discussions in 2013-14 to develop additional plans to communicate and promote community involvement in schools. Community groups such as the mustang bench, Greenfield High School Boosters, Lutheran church, King City Beatification Committee and others continue to help the district with joint projects.
2. The district continues to make all donor groups for facility projects aware that regulatory agencies have compliance issues when it comes to constructing concession stands or other needed facilities.
3. The district's facilities planning committee, which is composed of community members and district personnel, continues to meet quarterly to discuss the use and availability of district facilities to promote community awareness.
4. Board Policy 1330, Joint Use Agreements, was adopted. This policy promotes the use of public resources and increases access to services the district provides, in cooperation with any public agency, public institution and/or community organization.
5. School principals indicated that external agencies and community groups use school facilities regularly.
6. The state administrator is creating a district foundation to increase community involvement in the development and use of the schools.
7. The district did not have an up-to-date fee schedule for the use of its facilities.

Recommendations for Recovery

The district should:

1. Continue to use the facilities planning committee to help develop a plan to increase community involvement in the schools.
2. Update its board policy for civic center use, and update its facility fee schedule for community and public agency use.

Standard Fully Implemented

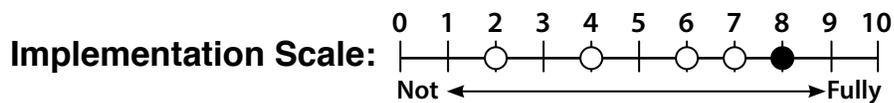
February 2010 Initial Rating: 2

March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

The district's facilities advisory committee had met regularly to review district facility needs. The state administrator had begun creating a district foundation to increase community involvement in school facilities improvements and community trust for the organization. The district continued to communicate with the public regularly through the Facility Inspection Tool mandated by the Williams Act.

Summary of Fifth Comprehensive Review, June 2014

The district's facilities advisory committee meets quarterly to review facility needs and future projects. The district continues to communicate with the public regularly through the Facility Inspection Tool (FIT), which is on its website.

Findings

1. The district's facilities advisory committee continues to meet quarterly. The committee is chaired by the state administrator and is composed of district personnel and community members. The committee has reviewed current and future building projects, safety issues and deferred maintenance projects. In the forthcoming fiscal year it will also evaluate the potential receipt of approximately \$2 million from the state's ERP.
2. The state administrator makes 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.
3. The district continues to communicate with the public regularly through the FIT, which is mandated by the Williams act; this information is on the district's website and is presented quarterly at public board meetings. The information includes any findings, deficiencies and recommendations.

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. Consider making facilities reports quarterly at the monthly board of trustees meetings.

Standard Fully Implemented

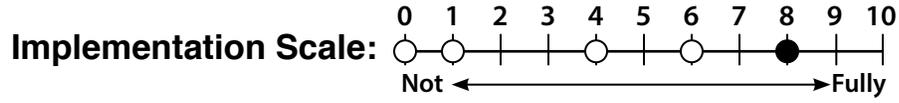
February 2010 Initial Rating: 0

March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 8



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.

Summary of Fourth Comprehensive Review, March 2013

The purchasing processes established by the business office were being followed and the system was working well. The MOTF technician was still monitoring the MOTF department's purchasing processes, and the records were well organized. The district had not updated its board policy related to purchasing.

Summary of Fifth Comprehensive Review, June 2014

The district's purchasing processes continues to use industry-standard purchasing practices and protocols established by the business office. The MOT technician monitors the MOT department's purchasing processes, including open purchase orders (POs) to external vendors.

Findings

1. The purchasing process developed by the district's business office requires a completed purchase requisition for all purchases.
2. The district maintains open POs with local vendors for routine purchases of frequently used items. Receipts for these purchases are filed in a binder that corresponds to the open PO.
3. The MOT technician monitors the MOT department's purchasing processes, including open purchase orders to external vendors. FCMAT verified that letters were sent to all vendors for the 2013-14 fiscal year that outline the district's purchasing requirements, including the requirement for authorized signatories.
4. 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, including notifying all vendors of the district's process and controls for purchasing items that exceed a specified dollar amount.
2. Update the board policy for purchasing to include the district's procurement practice.

Standard Fully Implemented

February 2010 Initial Rating: 1

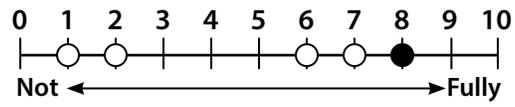
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

Implementation Scale:



Appendix A

Source Documents

The following source documents were used by FCMAT to evaluate the standards contained in the facilities section:

1. List of emergency contact telephone numbers (1/22/14)
2. Staff meeting agenda for emergency procedures school safety plan (9/04/13)
3. Sign in sheet for staff meeting referenced above
4. Board policy 3156 (a), Emergencies and Disaster Preparedness Plan (1/12/11)
5. Board policy 0450 (a) Comprehensive Safety Plan (6/27/12)
6. Minutes from King City High School Site Council meeting (11/20/13)
7. King City High School Safety Plan sign-in sheet (11/20/13)
8. Greenfield High School Site Council meeting minutes, agenda and sign-in sheet (8/07/13)
9. Greenfield High School Site Council meeting minutes, agenda and sign-in sheet ((11/04/13)
10. Greenfield Comprehensive School Safety Plan Adoption form (11/04/13)
11. King City and Greenfield High School fire evacuation drill procedures and map (11/07/12)
12. Emergency Preparedness Teacher Class Status form (No date)
13. King City and Greenfield High School lockdown procedures ((2/05/13)
14. King City and Greenfield High School Reaction Plan (1/14/13)
15. King City and Greenfield High School Fire Drill Calendar (11/12/13)
16. Board Policy 3515 9 (a) (b), and Administrative Regulations for Campus Security (9/08/10)
17. Facility Inspection Tool (FIT) for King City and Greenfield High Schools (04/13/13)
18. Monterey County Office of Education Quarterly report for FIT inspection (10/01/13)

19. Keenan & Associates Property and Liability Inspection Report (2/01/13)
20. Keenan Hazardous Materials Report (07/22/13)
21. Board Policy 3514 (a) and Administrative Regulations, Environmental Safety (3/13/13)
22. Board Policy 7000 and administrative regulations for facilities concepts and roles (9/08/10)
23. Board Policy 3517 (a), Facilities Inspection (11/12/11)
24. Administrative Regulation 7111, Evaluating Existing Building (4/17/12)
25. Board Policy and Administrative Regulations 7140, Architectural and Engineering Services (05/11/11)
26. Facilities Planning Meeting agenda and sign-in sheet (3/13/13, 6/13/13, 9/5/13, 12/5/13)
27. Facilities Five-Year Deferred Maintenance Plan and facility listing of expenditure plan
28. Division of State Architect (DSA) resolution of certification to remove structures (2/28/13),
29. DSA certification and close of file for King City High School 10/03/13) (06/13/13), 11/06/13) 05/16/13)
30. 2013-14 account summary for resource 8110 and 8200 (01/16/14)
31. NTD Architecture Agreement for Services (06/24/13)
32. Change order for King City High School (10/01/13)
33. 2013-14 fixed asset inventory (01/16/14)
34. District organizational chart (08/27/13)
35. Organizational charts for King City and Greenfield high schools (09/11/13)
36. Board Policy 1330 (a) (b), Use of Facilities (10/09/13)
37. Injury and Illness Prevention Plan (2012-13)
38. Employee safety training records (2013-14), training complete through February 3, 2014
39. Comprehensive Safety Plan for King City and Greenfield high schools (2012-13)
40. Job descriptions for grounds workers, custodial and maintenance positions (2013-14)

41. Custodial cleaning standards (2012-13)
42. Material Safety Data Sheets for King City and Greenfield High Schools
43. Key control logs for King City High School (2013-14)
44. Facilities Master Plan (2010-11)
45. Architectural drawings for King City High School
46. Sample work orders (2013-14)
47. Facilities Use Request (2012-13)
48. Open Purchase Order letter to vendors (07/01/13)

Appendix B

Positions Interviewed

The FCMAT study team interviewed the following positions on February 3 and 4, 2014 to evaluate the standards in the facilities section:

1. State administrator
2. MOT director
3. Human resources administrator
4. Principal, King City High School
5. Assistant principal, King City High School
6. Principal, Greenfield High School
7. Business office/MOT technician
8. Business manager

Table of Facilities Management Ratings

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
1.1	<p>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)</p>	2	4	5	5	9
1.3	<p>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)</p>	4	4	4	4	6
1.8	<p>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)</p>	3	4	5	7	8
1.9	<p>LEGAL STANDARD – SCHOOL SAFETY The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)</p>	0	3	5	5	8
1.15	<p>LEGAL STANDARD – SCHOOL SAFETY The LEA maintains updated Material Safety Data Sheets for all required products. (LC 6360-6363; CCR Title 8, Section 5194)</p>	1	4	8	9	10
1.16	<p>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.</p>	2	5	8	8	10
1.18	<p>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.</p>	1	1	2	6	8
1.20	<p>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.</p>	0	1	1	1	6

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
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	N/A
2.3	LEGAL STANDARD – FACILITY PLANNING The LEA has established and uses a selection process to choose licensed architectural/engineering services. (GC 4525-4526)	1	1	6	7	9
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	9
2.8	PROFESSIONAL STANDARD – FACILITY PLANNING The LEA has a facility planning committee.	0	0	5	7	8
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	9
3.3	LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION All relocatable buildings in use meet statutory requirements. (EC 17292)	0	0	2	3	7
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	10
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	9
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	9

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
4.2	<p>PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS</p> <p>The LEA maintains appropriate project records and drawings.</p>	2	3	5	4	7
6.4	<p>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</p> <p>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.</p>	1	2	6	6	8
6.5	<p>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</p> <p>Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.</p>	0	1	6	7	9
6.6	<p>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</p> <p>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</p>	2	2	6	7	8
6.7	<p>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</p> <p>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.</p>	0	0	1	1	7
6.8	<p>PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS</p> <p>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.</p>	0	1	4	4	7

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating
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	7
8.2	PROFESSIONAL STANDARD – COMMUNITY USE OF FACILITIES The LEA has a plan to promote community involvement in schools.	2	4	6	7	8
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	8
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	8
Collective Average Rating		1.04	2.15	4.85	5.63	8.15

The collective average ratings for all previous years are based on the subset of priority standards used starting with the second comprehensive review, as well as Standard 2.2, which is no longer applicable or included in the ratings as of the fifth comprehensive review.