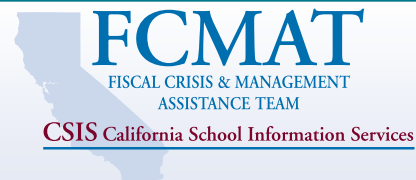


South Monterey County Joint Union High School District



Comprehensive Review and Recovery Plan

Progress Report

May 2015



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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 2013-14, the district served 1,962 students, just nine fewer than its 2012-13 enrollment of 1,971 students.

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: 30.0% 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.

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.

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 initially 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 ongoing 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.

May 2015:

Community Relations/Governance: average rating 7.61, with no standards under a 4.

Personnel Management: average rating 8.61, with no standards under a 4.

Pupil Achievement: average rating 5.63, with no standards under a 4.

Financial Management: average rating 6.0, with no standards under a 4.

Facilities Management: average rating 8.44, with no standards under a 4.

Table of Summary of Scores

Operational Area	February 2010		March 2011		March 2012		March 2013		June 2014		May 2015	
	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4	Average Score	Standards under 4
Community Relations/Governance	0.89	17	2.83	13	5.11	1	6.78	0	7.5	0	7.61	0
Personnel Management	0.92	26	2.69	16	4.27	7	5.88	1	7.15	0	8.61	0
Pupil Achievement	1.38	31	1.87	31	2.87	25	4.50	5	5.78	0	5.63	0
Financial Management	1.54	39	2.93	23	3.39	21	3.54	20	4.76	7	6.0	0
Facilities Management	1.04	25	2.15	20	4.85	6	5.63	4	8.15	0	8.44	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

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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

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For Facilities Management

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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.

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.

Despite areas that have room for some improvement, the progress made has been and continues to be significant and sustained. For this review and the one prior, the district maintained an average rating of greater than six in all operational areas except for Pupil Achievement. The district had no individual standard rated lower than a four in any operational area in this review; in the prior review it had seven individual standards rated lower than a four, all in Financial Management and all since then increased. The district also has systems and structures in place to sustain and build on its current level of performance in each of the operational areas. For these reasons, FCMAT recommends to the SPI that all five operational areas be returned to the governing board of the South Monterey County Joint Union High School District.

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. However, the district still remains in 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 2013 through November 2014.

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. The June 2014 average scaled score was 7.5, and the May 2015 average scaled score was 7.6, 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 three 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 receive 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 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, California Assessment of Student Performance and Progress (CAASPP) results) 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 director of educational 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; however, the district should periodically review the composition of committees to meet this goal. 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.

All five advisory board members have completed Masters of Governance training from the California School Boards Association (CSBA). 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 a combined total of 100 hours in classrooms.

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 2014-15 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 73.53 %¹ of its unrestricted general fund expenses going toward employee compensation, the district's ability to regain fiscal solvency requires continued and sustained improvements in this area.

The personnel management section of the comprehensive review assessed the district based on 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 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. In March 2015 the average

1. Source: 2013-14 State-certified data (the last year for which state-certified data is available)

scaled score increased to 8.61, demonstrating full implementation and sustainability of nearly all of the 26 standards. For this March 2015 review, no standards were not implemented; 3 standards were partially implemented, with a rating of one through seven; and 23 standards were fully implemented, with a rating of eight through 10.

Some of the most noteworthy improvements were in the area of employee recruitment and selection. The human resources department continues to improve selection procedures and implement best practices for hiring, including providing training to interview panels on nondiscrimination in hiring. The department continues to expand the use of pre-employment tests and exams for positions in the classified service, ensuring that the district is hiring highly qualified candidates. Administrative job descriptions were updated in the last year to ensure that they contain all legally required elements and that they reflect the competencies required of today's school site leaders. As a part of the district's recruitment strategy, the human resources department is building relationships with local universities and teacher preparation programs offering opportunities for student teaching and posting position vacancies at university placement centers.

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 added full-time equivalent (FTE) positions to the human resources department and reassigned duties to the receptionist. This has provided the senior director of human resources time to focus on continued improvements and allowed the department to continue to make and sustain operational improvements. The district has revised job descriptions and updated its functional organization chart to reflect these changes.

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. One misassignment was found during the 2014-15 Williams Assignment Monitoring Review but has since been resolved. The systems for assignment monitoring are well developed and sustainable.

As noted above, 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. It is using best practices for hiring, including providing training to interview panels on nondiscrimination in hiring; expanding use of pre-employment tests and exams for positions in the classified service; and continuing to update job descriptions. Because of its geographic location, recruitment of highly qualified candidates will continue to be one of the district's most significant challenges. The district is developing an aggressive recruitment plan and plans to begin recruiting and hiring early in the spring of 2015.

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 school 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 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. The department provided school and department administrators with training in using the performance improvement plan.

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 as required by Government Code (GC) 3547(a) and subsequently held a public hearing to give the public an opportunity to express itself regarding the proposals as required by GC 3547(b).

In December 2014 the district successfully negotiated new three-year agreements with its certificated and classified employee bargaining units. The district's negotiating team included school site administrators and classified managers. Although the state administrator is not required to involve board members in negotiations, he kept the board 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.

The human resources department continues to update 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, and continued to provide such training in 2014-15. In addition, the senior director of human resources provided new school administrators with training in contract management and grievance processing, and marked provisions of the agreement that were problematic at their assigned school sites. The new administrators report that the senior director set them up for success and as a result they have been able to avoid any grievances.

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 June 2014 comprehensive review report was 5.78. The mean rating on the standards in this 2015 report is 5.63, with 7 standards that declined in their rating and two that increased; the remaining 20 standards had the same rating as the prior year. Thirty standards are partially implemented, with a rating of one through seven; and two standards are fully implemented, with a rating of eight or nine. Progress is not being made on meeting pupil achievement standards, as indicated by the change in mean rating. The pupil achievement portion of this sixth comprehensive review emphasizes all recommendations

from the initial, second, third, fourth and fifth comprehensive reviews and provides some additional detail.

An atmosphere of cooperation and support for change was evident in the district and was expressed by the majority of those interviewed. The most notable difference between this annual review and previous reviews is the regression in areas of instructional strategies and assessment and accountability.

This past year was the first year districts had to develop and implement the local control accountability plan (LCAP). According to the district's LCAP, in March the district began consulting with various stakeholder groups, and as a result, was able to change and better address these groups' desires. The current LCAP reflects the perceived and real priorities of the district's students. Even with the stakeholder engagement outlined in the LCAP, the district needs to work to increase the awareness of administrators, teachers, parents and students. Many indicated they had not participated in the LCAP development and approval, and most had no knowledge of it or its role in planning for the year. Single plans for student achievement (SPSAs) were completed before the start of the school year, but King City High School's plan was approved at the school and district level with many items left blank in the areas of school goals, metrics and cost or funding source, and it had not been updated at the time of FCMAT's fieldwork in February 2015. School site councils are fully operational at each school. Steps have been taken to increase opportunities for collaboration between the two schools in developing common assessments and implementing the Common Core State Standards. Although district leaders are qualified and committed, changes in key leadership positions have slowed progress.

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

Systems

The district has experienced change in some key leadership positions. Although the district is working diligently to improve recruitment and selection of new personnel who are qualified and committed, this change has slowed progress. There is a new director of educational services, a new principal and assistant principal at Greenfield High School, an administrator position that is shared between King City High School and Portola-Butler Continuation High School, and a continuing need to fill the director of special education position. There has been little progress in developing various elements of a system that will provide an instructional program that meets the needs of all of the district's students. The district has an LCAP, LEA Plan, SPSAs for each school, and Western Association of Schools and Colleges accreditation studies and reports for planning. It is also providing resources to support these plans to the extent that they are available. The district has set clear goals, provided professional development, and made structural changes that will help support the implementation of these plans. The focus so far has been on developing systems, 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 outcomes.

The district continues its efforts to collaborate with feeder districts, which if successful will significantly affect its effort to improve student achievement. Families and local communities are affected by the quality of both the elementary and high school systems. Some progress has been made in addressing this issue, and the district is committed to continuing conversations and activities that will lead to K-12 partnerships.

The district should use the collective knowledge and skills of its teachers, administrators, support staff, students, and parents to fully implement the programs and activities in its plans. When challenges arise, those who were included in the process will become the best problem solvers.

Learning for All Students

The district is working to put in place policies and practices to ensure that every student has the opportunity to learn and does learn. District employees are working hard to address students' learning needs. The next step is to evaluate the current programs and focus on whether they are successful. This evaluation should be data-driven and dependent on multiple results. If the results are positive, actively engage in full implementation of the programs and strategies that will accelerate learning for all students, including English language development for English learners. 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 for monitoring student progress that is flexible enough to ensure early and appropriate intervention for students who are struggling. Most interventions are long-term and do not address the need to respond 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.

Students who are identified as English learners (EL) continue 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 372 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. Many students remain in ELD and specially designed academic instruction in English (SDAIE) courses, without the opportunity to move to the regular and higher level courses that allow them to earn 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 give up on earning a diploma or even finishing high school. Implementation of Constructing Meaning (CM) remains the district's primary strategy for meeting EL students' needs, though it is not used consistently throughout the district. The district needs to collect and analyze data on the impact CM has had on student learning. If the results are positive, the district should recommitment to this program and to the expectation that its strategies will be used in every classroom that has at least one EL student. If the results are not positive, the district should look for another way to support its many second language learners.

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 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 for monitoring and assessing student progress and everyone's willingness to take collective responsibility for students' academic success. Solutions to a shortage of resources and time can often be found by tapping the collective knowledge of teachers and administrators using a team approach.

When FCMAT visited the district in February 2015, the district had not had a director of special education for four months. The district was contracting with a part-time independent consultant to evaluate the special education program and make an improvement plan. The district should

increase principals' and teachers' accountability for implementing the accommodations required for students with disabilities and require regular education teachers to attend individualized education program (IEP) meetings for those students.

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 demonstrate the urgency of finding 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 EL students. When resources allow, an increase in counseling should be considered. Administrators, teachers and students are concerned that there is not enough counseling available to ensure proper 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. 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. For example, although posting a clear language objective is a requirement of the CM program for secondary language learners, only 10% of the 40 classrooms FCMAT observed had such an objective posted. Administrators monitor classrooms frequently but do not provide any feedback to teachers following classroom visits. Administrators should give teachers the focus for classroom visits each week and provide feedback. 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 new director of educational services is working to focus the district's efforts in instructional leadership, professional development and the district initiatives.

The district has made progress in using collaboration time by providing structure and monitoring. Teachers appreciate that the work done during this time is primarily focused on improving teaching and learning. They feel supported by having an annual calendar of the collaboration time so they know what to plan for. Collaboration time is being implemented more consistently across the district. There seems to be a balance this year in how time is spent: some is focused on department meetings, some on planning across departments, some is administrator-led, and some is spent on articulation and planning between the two comprehensive high schools. Administrators attended a formal professional learning communities (PLC) training before the start of the school year and feel better equipped to guide the PLC processes on their campuses.

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, a more collaborative spirit, and shared understanding among staff members are all evident.

Leadership

School principals clearly understand their roles as instructional leaders at their schools and are well versed in teaching and learning and the steps needed to ensure that students are successful.

The faculty, support staff, parents and students spoke positively in support of the school site leaders. They are hopeful that the new administrators at Greenfield High School will stay and continue to provide consistency and stability. District support of school leaders is essential to principals' ability to improve student achievement. Being an instructional leader requires honest conversations. Administrators spend a lot of time in classroom observations but do not provide feedback to their teachers. To improve pupil achievement, these conversations are needed and should focus on improving instruction.

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.

Because its director of special education position has remained unfilled for most of the 2014-15 school year, the district contracted with a part-time special education consultant to review systems, programs and practices, and to write an improvement plan focused on staffing, program structure and quality, accountability, and compliance. The district has a critical need to establish a districtwide vision for special education and a comprehensive plan for its implementation. Attracting and retaining strong special education leaders is crucial to success in this area.

The fact that few parents and families are actively engaged in their children's education continues to be a concern. School leaders need to find ways to help parents and families feel welcome and valued and give them a meaningful role in improving their children's performance in school. The addition of a parent coordinator at the two comprehensive high schools has helped build trust and relationships with parents.

There are districts and schools across the state that are demographically similar to South Monterey County Joint Union High School District and that are significantly improving all of their students' academic achievement. 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. The district should learn from these districts, study their data, visit their schools, visit their websites, and benefit from what they have found to be effective practices.

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 6.00, with 36 standards partially implemented and five standards fully implemented. The March 2011 scaled score was 2.93, the March 2012 score was 3.39, the March 2013 score was 3.54, and the June 2014 score was 4.76.

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. Staff indicated that savings from the restructuring of the district's state loan are used for one-time purposes; for example, the district replaced more than 200 computers in classrooms and computer labs at the comprehensive high schools in 2014-15. 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 no absolute certainty of savings in any one year, the district

should review multiyear commitments for possible savings that can provide recurring revenue to support future technology plans and an equipment replacement schedule.

Budget and Multiyear Financial Projections

The district has drawn all of the funds from the state loan. Of those funds, \$2,986,818 remains in the special reserve fund for other than capital outlay projects (fund 17), and \$1,248,728 remains in the debt service fund (fund 56). The 2013-14 audit indicates that the auditors moved the monies in fund 17 to the general fund through a fund balance transfer; however, the district has not included this audit adjustment in its 2014-15 first interim report. The auditors made no adjustments to the funds held in the debt service fund. Some of the monies in fund 17 were earmarked to pay for state audit findings, which previously totaled \$1,424,851 (see chart in Standard 10.4). The Education Audit Appeals Panel decision issued on July 28, 2014 indicates that the district owes the state \$253,679 for resolution of three of the 2010-11 audit findings, which will be repaid in 2014-15.

The district has negotiated salary and health and welfare benefit agreements with the certificated and classified employee bargaining units for 2014-15, 2015-16 and 2016-17. The state administrator approved the tentative agreements at the January 20, 2015 board meeting.

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 district has reduced its audit findings from a high of 28 in 2010-11 to six in its last audit for the 2013-14 fiscal year. In addition, the auditor did not present a lack of going concern finding for the first time since the state loan was issued. Although a decrease in audit findings indicates that the district's efforts continue to yield results, the inability of the district's auditors to issue an unqualified report, and the findings of material weaknesses in internal controls, show there is room for improvement.

During this review period, the district filled the payroll/benefits technician and business technician positions, each with a full-time employee. Having two full-time equivalent (FTE) support positions in the business office has provided the chief business official (CBO) an opportunity to train staff and to oversee more of the day-to-day operational tasks rather than complete them. However, cross-training is needed, and internal controls need to be strengthened in several areas including journal entry review, county treasury cash reconciliation, bank account oversight, associated student body (ASB) cash receipts, and ensuring that any one employee does not have access to both vendor demographic and payment screens.

The district needs to continue 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 2013-14 and continues to provide training to staff for this recently implemented system.

Schools have online access to the district's Escape financial software system and can review account line budgets and print financial reports; however, school administrators, department managers and staff responsible for budget and purchasing functions continue to 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.

The Escape system has the ability to allow users to prepare budget transfers and then have them electronically approved by the CBO for posting; however, this function has only been activated for a few users. Providing this online capability to all school and department managers and training staff in its use would help provide uniformity and better internal controls.

Student Attendance

School attendance clerks are trained to generate reports daily, weekly and monthly to test the accuracy of data input at the schools and to identify unexcused absences and possible truant students. At the district level, the data system analyst generates system reports periodically to verify the accuracy of the student attendance reported at the schools. The senior director of information technology prints Aeries system audit reports and reviews the final reports for accuracy and performs testing for reasonableness.

Staff indicated that teacher recording of student attendance has improved; however, there are still some teachers who periodically fail to sign their weekly report and/or take attendance in a timely manner. The district needs to continue efforts to hold accountable any teacher who fails to complete an accurate and/or timely record of attendance.

Previous recommendations to provide cross-training on the California Longitudinal Pupil Achievement Data System (CALPADS) have been implemented to ensure that essential functions can be maintained in the absence of the data system analyst. The district needs to provide mandatory student attendance training before the start of each school year for attendance clerks, school secretaries and principals to ensure that proper procedures are followed consistently throughout the district. This training should include any new attendance accounting procedures and changes in state regulations.

The district's student enrollment has declined over the past 10 years. However, staff reported this trend was expected to reverse beginning in 2014-15, and projects that enrollment will continue to increase for at least the next two years. The district needs to continue to monitor and project student enrollment and average daily attendance (ADA) at each reporting period to ensure that the most recent data is included in budget assumptions and that totals used in the budget and multiyear projections have not been overestimated.

Associated Student Body

During this review period, the district continued to divide ASB bookkeeping functions between the district office and school sites. The district published a manual of ASB documentation

procedures and instructions, and has provided one-on-one training on those procedures to school personnel who have ASB accounting duties. The district needs to provide ongoing training for ASB advisors and other school personnel who have ASB accounting responsibilities at least annually, and immediate initial training for new ASB personnel. As additional ASB functions are returned to the school sites, the district needs to consider implementing internal audit procedures to ensure that proper internal controls and adequate oversight are maintained. External and internal ASB audit findings need to be shared with school administrators and staff responsible for ASB functions, and these personnel should provide a plan for resolving them.

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 training and support. Two significant problems still remain to be resolved: the inability to easily generate classified seniority reports and evaluation due date reports. District and county office staff indicate that district staff need additional training and that the Escape system needs further configuration to resolve these issues.

The technology staff provide central operations to support a wide range of technology services districtwide including training, troubleshooting, implementing new software, and updating the districtwide technology plan. The district has a 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. The district has also developed a comprehensive technology policies and procedures manual designed to complement and support its technology plan. All hardware and software purchases are required to conform to the district's technology standards listed in the manual and must be approved in advance by the senior director of information technology. However, several staff members were not aware of the documented hardware or software standards. The manual needs to be shared with staff and posted to the district's website. The manual also needs to be updated to include greater detail regarding software and hardware standards and differences in standards for students, teachers and support staff.

Food Services

The CBO continues to lead the district's food services department, and staff in food service lead positions oversee day-to-day operations at each school and report directly to the CBO. The district purchases ready-to-serve food items from vendors, which district staff heat and serve. The district needs to continue to monitor and adjust food offerings and revise menus periodically to increase student participation.

The district has taken measures to prevent unauthorized fundraising activities on its school campuses that directly interfere or compete with the National School Lunch and School Breakfast programs. The district and school administrators need to continue to ensure adherence to program regulations to avoid jeopardizing both federal and state food service funding.

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, the March 2013 scaled score was 5.63, the June 2014 average scaled score was 8.15, and the average scaled score for May 2015 is 8.44. 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 the newly hired director of maintenance, operations, transportation and facilities (MOTF) (September 2014) have maintained the course of facilities improvement established during the previous reviews. 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 director of MOTF 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. These programs have continued to improve with each consecutive assessment.

School Safety

The director is responsible for developing and implementing all of the district's regulatory and legal compliance programs as they relate to the safety of facilities, staff and students. The district does not have a districtwide safety committee to help develop and maintain its comprehensive school safety program. FCMAT is recommending that the district designate the MOTF director to be responsible for the formation of a comprehensive employee safety program and committee in accordance with Board Policy 0450. Additional recommendations include scheduling comprehensive school safety inspections at least two times per year with each site administrator.

Facility Planning

The district's facility planning committee continues to meet quarterly to review current and future building and facility improvement needs. The district has included a plan for ensuring the equity of its school sites in its school facilities planning committee process. The committee has identified improvement projects at all school sites and budgeted for projects in the 2013-14 and 2014-15 fiscal years

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, because of its ongoing facility needs, the district

has allocated \$350,000 for preventive maintenance in each of the past two fiscal years; this was reviewed and approved by the facility planning committee.

The Office of Public School Construction's (OPSC) Emergency Repair Program (ERP) provides grant and/or reimbursement funding to local educational agencies (LEAs) for the cost of repairing or replacing existing buildings or structural components that are broken or not functioning properly and that pose a health and safety threat to students and staff at eligible school sites.

As of February 24, 2015, the State Allocation Board apportioned \$530.8 million for funded projects and approved \$266.1 million for unfunded projects. The OPSC ERP workload list shows that the South Monterey Joint Union High School District (formerly King City Joint Union High School District) will receive funding in the 2014-15 or 2015-16 fiscal year. The district is among those districts with projects on the approved but unfunded list. The district can anticipate receipt of \$1,888,121 in emergency repair funds for King City High School and \$78,696 for Greenfield High School in the 2014-15 or 2015-16 fiscal year.

Facility Improvement, Modernization, and Construction

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

Facilities Maintenance and Operations

Supervision of custodial and grounds workers has been returned to the MOTF director. In the prior review, the school principals shared the authority to modify the work schedules developed by the MOTF director.

The district continues to use work standards and comprehensive work schedules for its maintenance and grounds worker positions

The district has implemented School Dude maintenance software to monitor, track and record work orders. The software will help the district improve timely responses and determine projects' costs and feasibility. The School Dude work order system allows 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, and 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 Facility Inspection Tool (FIT) review and has a written plan to promote community involvement in the schools.

The district continues to make all community groups involved with facility projects aware that regulatory agencies require compliance with certain regulations and have jurisdiction over the alteration or repair of school facilities. The district's facility fee schedule was updated during the fiscal year to address ongoing community use of the facilities at both high 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 Sixth Comprehensive Review, May 2015

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

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. Negotiations with both units have been completed for the next three years with no reopeners. The state administrator is the chief negotiator for the district; however, consideration should be given to delegating this responsibility to another administrator, such as the human resources administrator, before the district returns to local control.

The district has hired a marketing consultant to obtain and communicate to parents positive information about activities at both high schools. A marketing plan is being developed.

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. The district continues to receive positive coverage from the King City Rustler newspaper, including updates on the state of the district.
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, 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 receive 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. CSEA's regional labor representative also attends these meetings. CSEA has a concern that the amount of work classified employees have to perform is being spread among fewer members, making it difficult to complete their work assignments.

8. The working relationship with the South Monterey County Joint Union High School District (SMCJUHS) teachers' association leadership has improved significantly. Employee organizations continue to 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 state administrator should encourage employee organizations to report to the advisory board regularly regarding employee association activities.
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. Negotiations with both bargaining units have been completed for the next three years with no reopeners. The state administrator is the chief negotiator for the district; however, consideration should be given to delegating this responsibility to another administrator, such as the human resources administrator, before the district returns to local control.
10. 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. The state administrator has been focused on the district's accomplishments; however, the state administrator should be concerned that some staff and community members may be losing sight of the district's continuing financial difficulties. The state administrator must continually remind people that improving relationships and the work environment does not necessarily affect the district's fiscal problems.
11. The district has hired a marketing consultant to obtain and communicate positive information to parents regarding activities at both high schools. A marketing plan is being developed.

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, improve and sustain the plan.
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 send the newspaper the 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. Encourage employee organizations to report regularly to the board on employee association activities.
8. Consider delegating the role of chief negotiator to another administrator, such as the human resources administrator, before the district returns to local control.
9. Ensure that schools 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

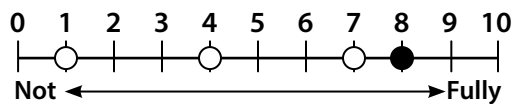
March 2012 Rating: 4

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8

Implementation Scale:



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 Sixth Comprehensive Review, May 2015

The state administrator has significantly improved communication with staff. Communication continues to be systematic and sustained. The state administrator has an open door policy and encourages face-to-face interaction with district employees. The Alert Now telephone message system informs parents when their child is tardy or absent from a class or school. The district uses We-tip for fraud reporting and has instituted a district fraud alert line for district employees to report fraud anonymously. 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.

Findings

1. The state administrator continues to disseminate information using a blog, which provides staff and community members with get up-to-date information and allows them to respond promptly. The blog has largely replaced the monthly newsletter that was previously included in employee paychecks.
2. 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.
3. 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.
4. There is evidence of systematic communication at schools regarding monthly staff meetings, state testing and reporting (STAR) meetings, school site council meetings, English learner advisory committee (ELAC) meetings, department meetings, and other key meetings and events.
5. 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.
6. The Alert Now telephone message system informs parents when their child is tardy or absent from a class or school. The district uses We-tip for fraud reporting and has instituted a district fraud alert line that employees can use to report fraud anonymously.
7. 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 /Local Control Accountability Plan (LCAP) committee, a facilities committee, a technology committee and a recently formed diversity committee. 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.

8. 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

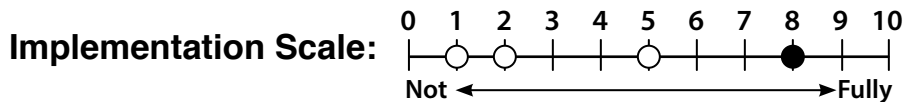
March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 8

June 2014 Rating: 8

May 2015 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 Sixth Comprehensive Review, May 2015

Advisory board members understand their roles and responsibilities related to communicating with the public. All five of the advisory board members except one have completed Masters of Governance training from the California School Boards Association (CSBA). 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 is committed to having all future members receive CSBA training.

Findings

1. Board Policy 1100, adopted November 16, 2011, identifies roles, responsibilities and methods of communication with the public regarding the district's programs and decisions. Board policy 1112, adopted May 11, 2011, established 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. All advisory board members will have completed the CSBA Masters' of Governance training by March, and the advisory board is committed to having all future members receive this training.
6. Staff and advisory board communication, and media coverage, have improved. There has also 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.
7. Schools 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 schools (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:

1. Fully implement updated board policies, particularly 1100 and 1112 regarding community relations, by continuing to follow its written communication plan; implementing its goals, guidelines and procedures; and distributing them to staff.
2. Encourage 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.
3. Provide ongoing media relations training for advisory board members and district administrators, including training in the CSBA Masters of Governance program for future board members.
4. Schedule regular meetings of the media and authorized district spokespersons to improve communication, increase understanding regarding which individuals are authorized to speak on the district's behalf, gain more positive and accurate press coverage, and better inform the public of the district's policies and activities.
5. Continue to provide the media with written press releases regularly. Ensure that the state administrator communicates with the media frequently, including between and immediately following advisory board meetings.

Standard Fully Implemented

February 2010 Initial Rating: 0

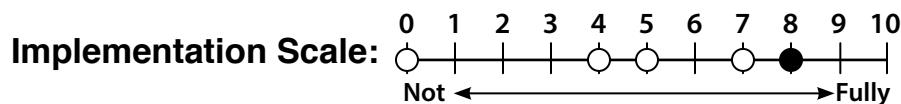
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 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 Sixth Comprehensive Review, May 2015

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. The Alert Now system provides telephone messages to parents when their child is tardy or absent from a class or school.

Parents indicate that use of the Alert Now system has increased dramatically over the prior year.

The district has hired parent liaisons at each of its comprehensive high schools. The district hopes that the parent liaisons will successfully engaging parents to be more involved in their children's education.

Findings

1. A communication plan has been developed and is used systematically. 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 speaks at King City and Greenfield Rotary club and chamber of commerce meetings.
6. There is media coverage of meetings with parents regarding the status of the district's schools.
7. Parents have limited involvement 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. 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 and both increased opportunity for instruction and increased state funding. Parents indicate that use of the Alert Now system has increased dramatically over the prior year.
10. The district's website continues to be updated and is significantly improved. Parents can view announcements of school meetings and events. The website also 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 and discipline records online. However, student grades are not posted to the parent portal in a timely manner, which causes parents some frustration.
11. The district has a blog from which staff and community can get current information and to which they can respond immediately.
12. The district has hired parent liaisons at each of the comprehensive high schools and hopes that they will be successful in engaging parents to be more involved in their children's education.
13. School site plans follow district goals.
14. Principals hold public forums with parents and community members.
15. It is clear that the state administrator is the district's designated public spokesperson.

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 annually 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 its website with information that includes ways for parents to become more involved in school activities and encourages them to do so.
7. Ensure that students' grades are posted to the parent portal on the district web site on a timely basis.
8. 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. Invite the local newspaper reporter to school site council meetings and other advisory committee meetings because all these meetings are public.

Standard Fully Implemented

February 2010 Initial Rating: 4

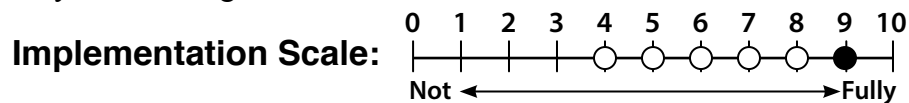
March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



2.8 Parent/Community Relations

Professional Standard

Board members are actively involved in building community relations.

Summary of Sixth Comprehensive Review, May 2015

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.

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 club meetings and attend city and community events.

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 its members spend a cumulative total of at least 100 hours in 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.

Recommendations for Recovery

The district should:

1. Continue its 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 annually 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 continues, in conjunction with the state administrator, to develop 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 classrooms annually.
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

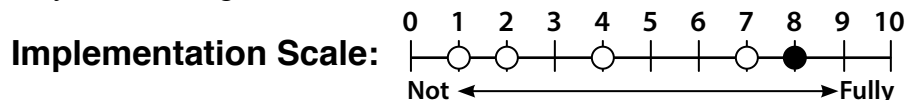
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

Policies and bylaws exist for establishing and operating school site councils. The school site councils are intimately involved in developing single plans for student achievement. The site councils deal with both program and budget issues.

Findings

1. The district has policies (Board Policy 6020) and procedures for establishing 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 2014-15.
6. School site councils have been formed and meeting dates have been set for the 2014-15 school year.
7. The assistant superintendent positions have been eliminated. However, a director of curriculum and instruction 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

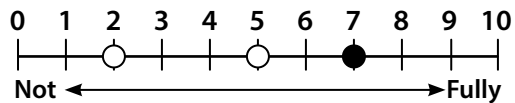
March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 7

May 2015 Rating: 7

Implementation Scale:



3.4 Community Collaboratives, 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 Sixth Comprehensive Review, May 2015

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 director of curriculum and instruction, focused on student achievement. The district continues its efforts to ensure that the various committees' membership reflects the diversity of its students and community; however, there is more work to be done in this regard.

Findings

1. The district has formed school site councils, and they are functional.
2. The district has established district advisory committees for budget and LCAP, facilities, technology, diversity, ELAC and curriculum; these committees meet regularly and maintain agendas and meeting minutes. The curriculum advisory committee deals with federal categorical programs and budgets.
3. The district has eliminated its assistant superintendent of administrative services position but has hired a director of curriculum and instruction, 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. Regularly review the composition of committees to ensure that they reflect the demographics of the community.
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, handicapped accessibility 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 developing a plan to recruit more individuals from the community to participate as members of various committees.

Standard Partially Implemented

February 2010 Initial Rating: 1

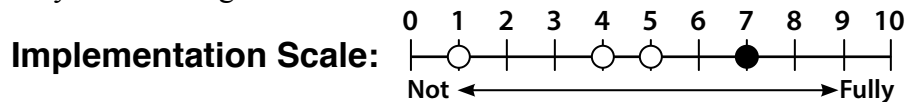
March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7

May 2015 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 Sixth Comprehensive Review, May 2015

The district continues to establish training programs for advisory committees, but training programs are not fully developed or implemented and are not systematic or sustainable. The turnover in the leadership position in the curriculum and instruction department has hindered progress in this regard.

Findings

1. There is written evidence of a modest training program for school 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 have received training in the past, but it has not been sustained.
4. The DELAC has not made any presentations recently 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 program budgets and the district's goals regarding 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. Have the DELAC committee give short presentations to the advisory board.

Standard Partially Implemented

February 2010 Initial Rating: 1

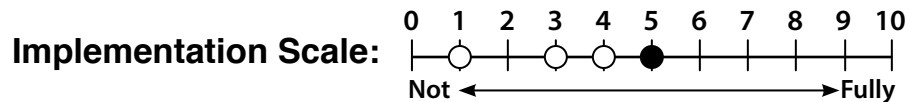
March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 5



4.5 Policy

Professional Standard

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

Summary of Sixth Comprehensive Review, May 2015

Progress in this standard since the first review has been significant. The advisory board is keenly aware of its obligation to follow its own policies once they are adopted. The advisory board has adopted new policies and updated existing policies using the California Association of School Boards Association's (CSBA's) Gamut online resource.

Findings

1. The advisory board has consistently followed its policies once adopted.
2. With guidance from the state administrator, the advisory board is also active 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. The board still needs to ensure that an external review of board policies and administrative regulations is conducted.

Recommendation for Recovery

The district should:

1. Maintain the accountability and consistency that now exists with regard to this standard.
2. Conduct a comprehensive external review of all board policies and administrative regulations.

Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 4

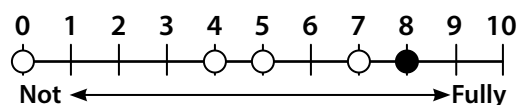
March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8

Implementation Scale:



5.2 Board Roles/Boardsmanship

Professional Standard

Board members receive necessary training to better fulfill their roles.

Summary of Sixth Comprehensive Review, May 2015

The advisory board members made a strong commitment to complete their CSBA training and receive their Masters in Governance certificates. Only one member has a one unit left to complete and is scheduled to do so in March 2015. The members are also somewhat active in the Monterey County School Boards Association, and some attend annual and quarterly meetings.

Findings

1. The state administrator has continued to provide all advisory board members with several trainings and special study sessions on numerous topics related to school district governance and policy implementation.
2. There is the strong belief, from several sources, that the advisory board members function as a team and disagreements are handled with professionalism and decorum.
3. Advisory board members are prepared for meetings and attend to the important issues of governance. They understand their role and its relationship with the state administrator; together they are working in harmony to move the district in a positive direction.
4. In its current advisory capacity the board has been shielded from voting on issues of controversy, leaving the more difficult tasks to the state administrator; however, it has recently taken advisory votes on public on agenda items.

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, thus serving as a model for and establishing expectations for future members.
2. Consider adopting bylaws that require all elected or appointed future board members to attend CSBA trainings and complete the Masters of Governance program.
3. Identify and cultivate community members who have the interest or the potential to be future board members. Frequently invite them to attend board meetings, and involve them in future governance, educational and leadership trainings.
4. Ensure that all advisory board members continue to avail themselves of the numerous ongoing opportunities the CSBA and other educational institutions provide for networking and training.

Standard Fully Implemented

February 2010 Initial Rating: 0

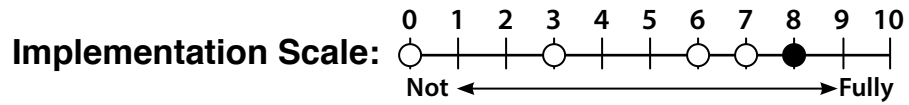
March 2011 Rating: 3

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 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 Sixth Comprehensive Review, May 2015

The district's LEA Plan for Program Improvement in Year Four has clear academic objectives and a vision for improving student achievement. This and the district's Local Control Accountability Plan (LCAP) will serve as the mission and vision for future work.

The district's Bring on the Pride theme has continued to focus the community on highlighting student success, but improving student achievement is still a need and will continue to require the advisory board's increased attention.

Findings

1. The district's LEA Plan for Program Improvement in Year Four has clear academic objectives and a vision for improving student achievement. In addition, the advisory board, by establishing a large community committee, was the first in the county to complete its Local Control Accountability Plan (LCAP) and identify the district's priorities. Both these documents will serve as the mission and vision for future work.
2. The district's LEA plan and its LCAP reflect desired social and academic outcomes.
3. The 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, attendance monitoring, curriculum changes reflecting common core and pupil support services.
4. There has been a much greater increase in teacher training and staff development, especially related to the new mathematics curriculum and English language learners.
5. The district's Bring on the Pride theme has continued to focus the community on highlighting student success. The theme is still reflected in newspaper articles and at student award events. However, improving student achievement and meeting the increased standards for academic excellence is still a great need and will continue to require increased attention from the advisory board.

Recommendations for Recovery

The district should:

1. Report more frequently to parents and the wider community regarding the specific academic targets it has established to meet the new state guidelines.

2. Keep all constituents informed about the district's progress on student achievement benchmarks and meeting the FCMAT standards.
3. Ensure that parents who do not have immediate access to computers, telephones or other technology are receiving frequent student achievement information, especially, but not exclusively, for their own student.
4. Consider holding informal community coffees in homes and local parks to reach parents who feel intimidated by the formal processes or who do not have access to the technology used for communication.

Standard Partially Implemented

February 2010 Initial Rating: 1

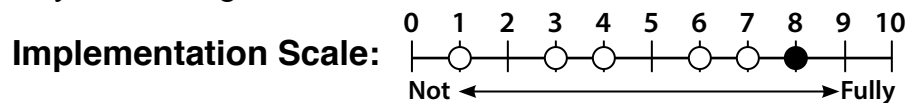
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

Advisory board relationships are harmonious in open and closed sessions. The CSBA Master of Governance Program training sessions have helped board members understand their present advisory role and their role when full governance authority is resumed.

Findings

1. Advisory board relationships are harmonious in open and closed sessions. Differences of opinion or preferences are resolved respectfully and professionally, but only recently have the members taken advisory votes on agenda items that call for recorded positions.
2. Advisory board members' support of and reliance on the state administrator to make financial and educational improvements has helped them better understand the importance of their role and what is necessary to assume their formal governance power.

Recommendation for Recovery

The district should:

1. Continue having the advisory board take advisory votes on all agenda items in preparation for assuming 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

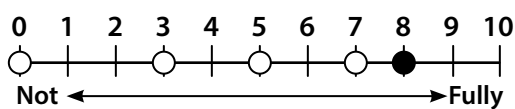
March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8

Implementation Scale:



5.6 Board Roles/Boardsmanship

Professional Standard

The board and administrative team maintain functional working relationships.

Summary of Sixth Comprehensive Review, May 2015

The state administrator and advisory board members report that protocols have been established for effective communication and that their relationships are harmonious. There is a better sense of team identity and cohesion among both advisory board members and the administrative staff. Board members follow the chain of command and refrain from going directly to principals or other staff members with community concerns or personnel issues.

Findings:

1. Interviews and documentation give evidence of the mutual regard and harmony that exists among advisory board members. They hold the state administrator in high regard and value his counsel and leadership.
2. Both the state administrator and the advisory board members report that protocols have been established for effective communication. Formal and informal communications from the state administrator have continued to keep the advisory board informed of weekly issues. There is mutual agreement that the advisory board informs the state administrator when issues arise in the community 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 are taken directly to the state administrator. The state administrator includes advisory board members in sensitive personnel matters and trusted their confidentiality during contract negotiations.

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 may join the board or staff changes occur.
2. Develop formal board bylaws that require the current communication protocols and chain of command for raising and solving community and district issues so that these become common and respected practices of the advisory board and future boards.

Standard Fully Implemented

February 2010 Initial Rating: 0

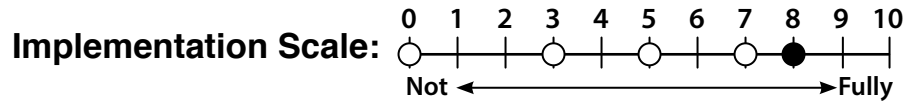
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8



5.9 Board Roles/Boardsmanship

Professional Standard

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

Summary of Sixth Comprehensive Review, May 2015

The state administrator is open and candid with the advisory board regarding confidential information, and the board respects that confidentiality.

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 confidential information, and the advisory board has respected that confidentiality.
2. The state administrator has included the board members in sensitive personnel matters and in the dynamics of the recent collective bargaining contracts, which resulted in a harmonious three-year agreement. The ongoing education advisory board members received from CSBA helped them understand the negative consequences of sharing confidential information.
3. The interpersonal relationships among advisory board members continue to be respectful and harmonious. The members appreciate the strengths each possesses and support one another publicly and in the community.

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 the resultant trust become an integral part of the district's governance culture.

Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 3

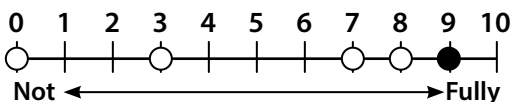
March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 8

May 2015 Rating: 9

Implementation Scale:



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 Sixth Comprehensive Review, May 2015

The state administrator uses CSBA's Gamut program to update board policies. New policies continue to be part of almost every board agenda, and the advisory board actively reviews and discusses the policies presented.

Findings

1. The state administrator continues to use Gamut to learn about and communicate changes in law and regulations that may require the adoption of new policies. New policies continue to be part of almost every board agenda, and the advisory board actively reviews and discusses the policies presented. As an advisory board they are more removed from ensuring the policies are appropriately implemented, but they are gaining knowledge for greater accountability and formal governance authority.
2. Although the advisory board now recognizes its responsibility to keep policies current, the recommendations for needed policy updates come primarily from the state administrator or administration.
3. The advisory board members recognize that test scores for many of the district's students continue to need improvement, and this has become their more immediate concern. They made an earlier commitment to spend a collective total of 100 hours in classroom visits each academic year but will need to be more aggressive if they are to meet this goal. Attending teacher trainings and then visiting classrooms to see if the training is being incorporated would help give board members credibility when making decisions that affect teachers and classroom instruction.
4. Board members indicated that they had not been as visible at schools and events as in past, and this was confirmed by the union vice president. Board members have also not attended any staff development activities. The absence of board members from school events, classroom visits and staff development indicates that their independence as decision makers still needs more development.

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. Work to ensure that reliance on the state administrator to initiate policy changes diminishes over time. Consider establishing an advisory board subcommittee to review and write future policies for recommendation to the full advisory board for adoption.
3. Ensure that advisory board members become more familiar with good instructional practices by attending district teacher training session and then increasing their classroom visit to see if the training is being incorporated.

Standard Partially Implemented

February 2010 Initial Rating: 0

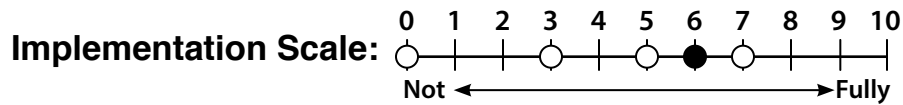
March 2011 rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 6



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 Sixth Comprehensive Review, May 2015

Advisory board members are active in the community; however, few members of the community attend board meetings, and the board's performance in the face of public controversy or opposition remains untested. All members of the advisory board are active within their respective communities, contributing to the wellbeing of their cities in several different venues.

The advisory board continues to discuss student achievement, curriculum and instruction, and pupil services issues at most board meetings.

Findings

1. Advisory board members are active in the community: two members hold seats on local city councils; some are members of Rotary club and the Chamber of Commerce; some serve on local social committees; and many attend school activities and events.
2. Although the advisory board has contacts with members of the community outside their district responsibilities, few members of the community attend board meetings. Because of this, the board's performance in the face of public criticism, opposition or controversy remains untested.
3. The advisory board continues to discuss issues related to student achievement, curriculum and instruction, and pupil services at most board meetings. With new state funding, there are new discussions of starting programs to further support achievement.
4. The parent group interviewed expressed concern that they knew more about the various opinions of the state administrator than those of the advisory board members. None of the parent group members had attended a board meeting or even knew members of the board.

Recommendations for Recovery

The district should:

1. Develop frequent community assessments, such as surveys, to determine if the work being done by the advisory board reflects the community's desires. Use survey results to help the advisory board set future direction and goals once they have full authority.
2. To increase community attendance, use the automated telephone system to invite community members to attend board meetings.
3. Ensure that advisory board members continue to make every effort to attend student activities and events to continue improving their credibility, visibility and knowledge of schools staff, parents and students.

4. Consider reducing goal for the total number of hours advisory board members are to spend in classrooms; however, ensure that the advisory board's commitment to visit classrooms and report the visits made at each board meeting is reaffirmed and carried out.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

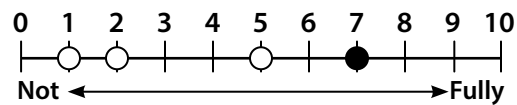
March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating 7

May 2015 Rating: 7

Implementation Scale:



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 Sixth Comprehensive Review, May 2015

Advisory board members are attentive, come to each meeting prepared, and 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, may pull items off the consent calendar for further discussion, and will make additions or corrections to written policies or agenda items.
2. Items scheduled for future advisory board meetings are often introduced in the Friday updates from the state administrator, which allows advisory board members to be better prepared for meetings.
3. As a part of their training, since late January 2015 the advisory board members have been taking advisory votes on each agenda action item, and these votes are publicly recorded in minutes.
4. Few members of the public attend board meetings. Increasing attendance would increase the visibility of the board's functions to the public and help the advisory board gain confidence in appropriately airing differences in the event of controversial issues in the future.

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 fulfill their governance role when local governance is restored.
2. Find ways to increase public attendance at board meetings.

Standard Fully Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 4

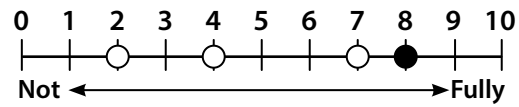
March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 8

May 2015 Rating: 8

Implementation Scale:



6.9 Board Meetings

Professional Standard

Board meetings focus on matters related to student achievement.

Summary of Sixth Comprehensive Review, May 2015

Because the district's finances have improved, more of the advisory board members' time and attention has been directed to student achievement.

Findings

1. Because fiscal matters have improved over the years, more of the advisory board members' time and attention has been directed to student achievement.
2. The educational services director routinely presents reports at board meetings.
3. Advisory board meeting minutes indicate that the board has been actively involved in adopting policies that support academic benchmarks, graduation rates, attendance and pupil support service issues. Minutes also indicate that the board had various discussions regarding student achievement and staff development.

Recommendations for Recovery

The district should:

1. Ensure that each advisory board meeting include presentations about various educational aspects of the district. Presentations by teachers, department heads, and the students receiving such services should become a routine instead of just presentations from staff.
2. Make student presentations and staff recognitions a routine part of advisory board meetings; this may increase parent and community attendance at meetings.
3. Encourage parents on school site councils and in curriculum advisory groups to make presentations at board meetings to encourage greater community participation in governance.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

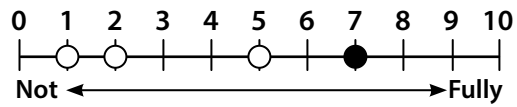
March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 7

May 2015 Rating: 7

Implementation Scale:



Appendix A

Source Documents

1. Newspaper articles
2. LEA Plan
3. LCAP
4. District safety plan
5. LCFF
6. Board agenda packets
7. Purchase orders for conference attendance
8. Copies of certificates of Masters in Governance
9. Press releases
10. Weekly updates from the state administrator
11. Registration for parent portal account
12. School site council agendas
13. School site plans (Single Plan for Student Achievement)
- 14.

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. Chief business official
5. Director educational services
6. Principal, Greenfield High School
7. Principal, King City High School
8. Assistant principal, King City High School
9. CTA chapter vice president, Greenfield High School
10. CSEA chapter president
11. Advisory board members (4)
12. Local newspaper reporter
13. Parents

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	May 2015 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	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	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	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	9
2.8	PROFESSIONAL STANDARD – PARENT/COMMUNITY RELATIONS Board members are actively involved in building community relations.	1	2	4	7	8	8

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
3.1	<p>LEGAL STANDARD – COMMUNITY COLLABORATIVES, LEA ADVISORY COMMITTEES, SCHOOL SITE COUNCILS</p> <p>Policies exist for the establishment of school site councils. The school site council develops a single plan for student achievement at each school, applying for categorical programs through the consolidated application. (EC 52852.5, 64001)</p>	2	5	7	7	7	7
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	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	5

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
4.5	PROFESSIONAL STANDARD – POLICY The board supports and follows its own policies once they are adopted.	0	4	5	7	8	8
5.2	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members receive necessary training to better fulfill their roles.	0	3	6	7	8	8
5.3	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board has established an LEA-wide vision/mission and uses that vision/mission as a framework for LEA action based on the identified needs of the students, staff, and educational community.	1	3	4	6	7	8
5.5	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members maintain functional working relationships. Individual board members respect the decisions of the board majority and support the board's actions in public.	0	3	5	7	8	8
5.6	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board and administrative team maintain functional working relationships.	0	3	5	7	8	8
5.9	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members respect the confidentiality of information shared by the administration.	0	3	7	8	8	9

Community Relations and Governance Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
5.10	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP Board members effectively develop policy and set the direction of the LEA while supporting the superintendent and administrative staff in their responsibility to implement adopted policies and administrative regulations.	0	3	5	6	7	6
5.11	PROFESSIONAL STANDARD – BOARD ROLES/ BOARDSMANSHIP The board acts for the community and in the interests of all students in the LEA.	1	2	5	7	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	8
6.9	PROFESSIONAL STANDARD – BOARD MEETINGS Board meetings focus on matters related to student achievement.	1	2	5	7	7	7
Collective Average Rating		0.89	2.83	5.11	6.78	7.5	7.61

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 Sixth Comprehensive Review, May 2015

The district continued to update board policies and administrative regulations and communicate with employees and the public during the last reporting period. The district is ensuring that board-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.

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. The district updated board policies to ensure compliance with changes in law related to mandated reporters and notices of employee misconduct to the Commission on Teacher Credentialing.
4. The district is holding hiring managers accountable for the consistent implementation of policies and procedures related to recruiting, hiring, supervising and evaluating employees.
5. 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.
6. 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 continues to communicate changes during monthly management meetings to ensure that the management team is aware of these changes. Additionally, the state administrator provides frequent professional development related to effective supervision and evaluation.

Recommendations for Recovery

The district should:

1. Continue to ensure that board-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. Continue to ensure that personnel-related policies and procedures adopted by the board are consistently implemented.
3. Continue to 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

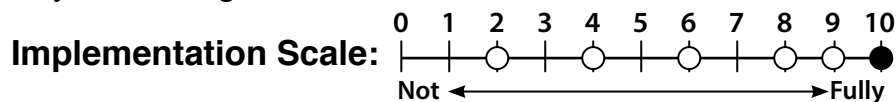
March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 8

June 2014 Rating: 9

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The human resources department's vision and mission statement and annual goals and objectives align with those of the district and are prominently displayed on the human resources web page. The department is using metrics in measuring and reporting progress to the board. All elements of this standard are fully and substantially implemented and have been sustained for a full school year.

Findings

1. 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. Metrics identified last year are being used to measure progress towards department goals. At the time of fieldwork, the second annual report to the board was in draft form and expected to be finalized and delivered to the board in May.
3. The report includes, but is not limited to, the following information:

The identification of department goals for 2014-15.

The identification of human resources accomplishments including, but not limited to, the following:

- The successful transition to a new financial system
- The development of human resources desk manuals
- Development of an employee handbook and substitute teacher handbook
- 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.
- A report on safety training and the number of workplace injuries
- 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.
- Goals for the coming fiscal year, including the desire to add a "What are people saying about our employees?" section to the human resources web page, implement

an employee recognition program, and install and implement a document imaging system.

4. Development of the annual report and the month in which it will be delivered to the board has been added to the human resources annual calendar.

Recommendations for Recovery

The district should:

1. Continue to ensure that the human resources department annually develops 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. Continue to ensure that the human resources annual calendar includes 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

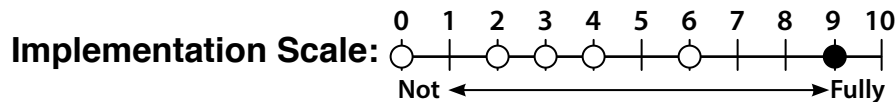
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district added a payroll/benefits specialist position and reassigned some human resource functions to the human resources specialist/receptionist; these changes have positively affected the human resources department. The human resources administrator position has been redesignated a senior director position, with responsibilities for negotiations and labor relations. All elements of this standard are fully and substantially implemented and are sustainable.

Findings

1. The district revised its human resources staffing and organization and recorded these changes on its organizational and functions chart; these include moving some key operational functions from human resources to other departments. This has reduced the human resources administrator's day-to-day workload, providing the time needed to ensure continued implementation of professional and legal standards with consistency and fidelity.
2. The state administrator assigned additional duties to the human resources administrator in the area of negotiations and labor relations, resulting in an upgrade in pay and change of position title to senior director.
3. Adding a payroll/benefits specialist position and reassigning human resource functions to the human resources specialist/receptionist have positively affected the human resources department.
4. The human resources department has updated the frequently asked questions (FAQ) document posted on the main human resources page of the district's website to include changes in position titles and the assignment of duties to human resource and payroll/benefits staff.
5. The human resources department reference manual continues to be updated as written human resources procedures and practices change and/or as new efficiencies are implemented.

Recommendations for Recovery

The district should:

1. Continue to update its human resources department reference manual annually. Add this task to its human resources annual calendar.

2. Add a quick link to the Frequently Asked Questions (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

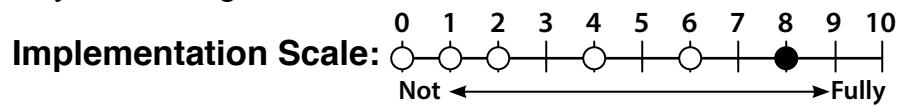
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

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. The human resources administrator position has been upgraded to senior director of human resources, with responsibilities for negotiations and labor relations. The elements of this standard are fully and substantially implemented and have been sustained over time at a high quality.

Findings

1. The human resources organizational chart has been revised to reflect the reallocation of human resource functions and changes in position title as a result of the district's 2014-15 office reorganization.
2. The senior director of human resources 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.
3. The human resources administrator position has been upgraded to a senior director of human resources position; this position now has responsibilities in the area of negotiations and labor relations and is taking more responsibility in the area of employee discipline.

Recommendations for Recovery

The district should:

1. Continue to update and revise job descriptions, organizational charts, and functions charts as needed.
2. Ensure that the senior director of human resources continues to participate as a member of the state administrator's cabinet and is provided with the professional development training and support needed to be successful in the areas of negotiations, labor relations, and employee discipline.

Standard Fully Implemented

February 2010 Initial Rating: 0

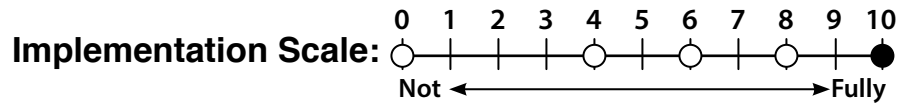
March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 8

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

Full implementation of the new Escape financial system has allowed the human resources department to ensure timely and accurate submission of personnel data to the student information manager for required California Longitudinal Pupil Achievement Data System (CALPADS) and California Basic Educational Data System (CBEDS) reporting. The department's annual calendar is updated annually. Elements of this standard are fully and substantially implemented and are sustainable.

Findings

1. The student information manager has a data management calendar that lists CALPADS and CBEDS activities and 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. The new Escape financial software is fully implemented and all personnel data has been moved to the system, making CALPADS and CBEDS reporting more accurate and efficient.
4. The senior director of human resources 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. Ensure that the human resources department continues to take responsibility for human resources-related data and functions related to CALPADS and CBEDS.
2. Ensure that the human resources department continues to provide the student information manager with personnel data according to the data management calendar to ensure timely submission of required state reports.
3. Ensure that the human resources department reviews and revises its annual calendar regularly so that correct adjustments are made.

Standard Fully Implemented

February 2010 Initial Rating: 0

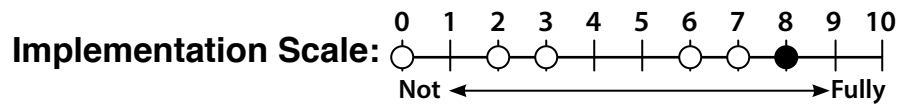
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

All elements of this standard continue to be implemented with fidelity and have been sustained over time. One misassignment was found during the 2014-15 Williams Assignment Monitoring Review but has since been resolved.

Findings

1. The 2014 Williams Assignment Monitoring Review indicated that there were no English learner (EL) misassignments. All classes with 20% or more EL students were staffed by teachers with the necessary certification.
2. One misassignment was found during the 2014-15 Williams Assignment Monitoring Review but has since been resolved. The affected teacher is scheduled to take the California Subject Examinations for Teachers® (CSET®) for physics and has enrolled in a program leading to physics authorization.
3. One limited-assignment permit was needed in the 2014-15 school year.
4. The human resources department continues to follow hiring procedures that ensure that authorized positions are based on enrollment projections and the needs of each school as indicated by the master schedule.
5. 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.
6. The certificated employee seniority list includes the credentials held by each teacher as well as supplemental and EL authorizations.
7. 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

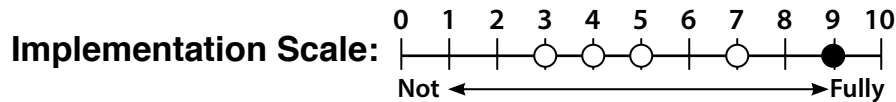
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 9

May 2015 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 Sixth Comprehensive Review, May 2015

The human resources department continues to make progress on this standard and has invested additional time and resources in its recruitment strategy. Although recruitment continues to be one of the district's most significant challenges and is compounded by a growing statewide teacher shortage, the department's efforts have increased the size and quality of classified and certificated candidate pools during this reporting period.

Findings

1. The human resources department developed enrollment projections for the 2014-15 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 now systematic and annually involve school site administrators.
2. The district is making staffing decisions earlier in the fiscal year, allowing the human resources department to recruit early and offer positions to the most qualified candidates.
3. The district's layoff, reassignment and recruitment decisions were based on identified needs.
4. The recruitment plan is included in the department's procedures manual. The department has developed a recruitment brochure and is continuing to develop relationships with area universities.
5. The department continues to make progress in recruitment. A more comprehensive plan has been developed that has increased size and the quality of candidate pools. The district has expanded advertising and participation in area recruitment fairs and continues to allocate additional resources in support of recruitment efforts.
6. The district uses EDJOIN (www.edjoin.org) for posting the recruitment of certificated staff, classified staff, and administrative positions; all applications for classified and administrative positions are received through EDJOIN.
7. 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. The district continues to build relationships with area universities.

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 continues to align with staffing needs and that it includes dates by which staffing decisions will be made. Ensure that staffing decisions continue to be made as early as is practical to enable early recruitment to ensure the most qualified candidates.
3. Ensure that the human resources department continues to receive a recruitment budget that allows it to develop an aggressive recruitment plan.
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 Fully Implemented

February 2010 Initial Rating: 0

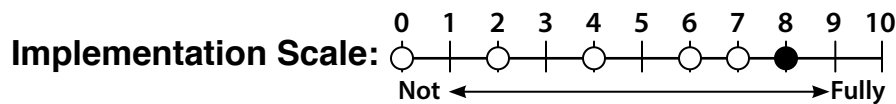
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

Selection procedures exemplify best practices. Improvements made over the last two reporting periods are substantial and are being sustained with high quality. The human resources department continues to evaluate and refine selection procedures and provide new employees with high-quality orientation and beginning teachers with an induction program.

Findings

1. The human resources department continues to conduct pre-employment exams for many classified positions as a part of the screening and selection process.
2. The human resources department has ensured that all interview panels are provided with a briefing that gives interview chairpersons the opportunity to discuss what is allowed and not allowed in an interview, as well as 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 reference check forms when hiring new certificated and classified employees for the 2013-14 and 2014-15 school years. However, reference checks are not listed as a step in the hiring procedures in the department's reference manual.
7. The district hired 15 new teachers this year and has implemented a teacher induction program (the RIMS- BTSA Riverside Teacher Induction Program).
8. 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:

1. Continue to ensure that reference check procedures are followed consistently and that the standard reference check form is used when recommending certificated and classified management and nonmanagement candidates for hire.
2. Continue to file all reference check forms in recruitment files.
3. Continue to retain recruitment records as temporary personnel records, and dispose of records according to the district's records retention policy.
4. Continue to update written selection procedures annually and make adjustments as needed. Ensure that the procedures include reference checking.
5. Ensure that all hiring managers continue to receive annual training in selection procedures so 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

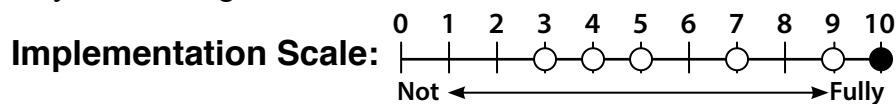
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 9

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The district's aggressive recruitment efforts led to the hiring of a number of highly qualified school and district leaders for the 2014-15 school year. As a part of human resources advertising plan, job descriptions were updated to ensure they contain all legally required elements and reflect the expectations for today's education leaders.

Findings

1. Based on information provided by the state administrator, the district's salaries for school administrators are competitive with salaries for similar positions in school districts statewide.
2. The district's salaries and employee benefits 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 were updated in the last year to ensure that they contain all legally required elements and that they reflect the competencies required of today's school site leaders.

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. Continue to update job descriptions for administrative positions as vacancies occur to ensure that they clearly communicate performance expectations and include all legally required elements.

Standard Fully Implemented

February 2010 Initial Rating: 0

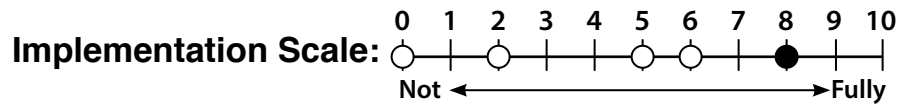
March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

For the third consecutive year, the human resources department expanded the Keenan Safe Schools online training program. The procedures for providing all employees with required annual notices are substantially implemented and are being sustained. At the time of fieldwork, the human resources department was working on a plan to create a paperless process.

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 online training and has, for the third consecutive year, expanded mandatory and voluntary trainings. Continuing 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. All staff participated in a number of new online trainings including customer service, conflict management, sensitivity awareness, and general ethics 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. At the time of fieldwork, the human resources department was working on a plan to create a paperless process.
5. The human resources department has added to its reference manual written procedures related to the required annual employee notices.

Recommendations for Recovery

The district should:

1. Continue to support the senior director of human resources 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 ensure the annual distribution and documentation of required notices to employees; pilot a paperless process at the beginning of the 2015-16 school year, and consider implementing an ongoing paperless process.
3. Ensure that any revisions to written procedures related to the required annual employee notices are updated in the department's reference manual.

Standard Fully Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 2

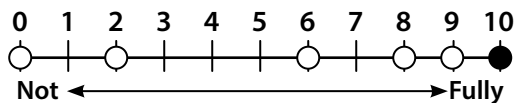
March 2012 Rating: 6

March 2013 Rating: 8

June 2014 Rating: 9

May 2015 Rating: 10

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 Sixth Comprehensive Review, May 2015

The human resources department has substantially implemented all elements of this standard, is sustaining improvements, and continues to implement best practices. Since the last reporting period, the department updated the new teacher and substitute handbooks and continued to ensure that all new employees participate in an orientation program.

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 is updating new employee and substitute employee handbooks annually and provides these to new employees during a rich program of orientation.
5. The district has implemented a program of induction for beginning teachers that provides them with a district coach and an online learning community with more than 2,000 members.

Recommendations for Recovery

The district should:

1. Ensure that employee handbooks continue to be updated annually and that the cover of the handbook indicates the date of the last revision.
2. Continue to provide new employees with a rich program of orientation.
3. Continue to ensure that the hiring process includes completion of the new employee checklist.

Standard Fully Implemented

February 2010 Initial Rating: 2

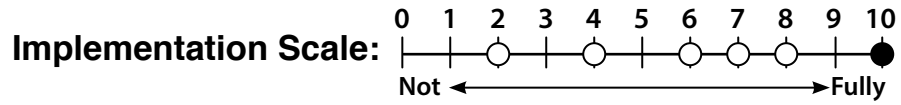
March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

District documents indicate that the district continues to reduce vacation and compensatory time liabilities. This standard is fully implemented and improvements have been sustained for multiple years.

Findings

1. The district's documentation indicates that 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. According to excess leave reports, three employees received vacation balance payouts in 2013-14 as part of a 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. While this is not a standard, it is a best practice and would help ensure that vacation payouts are not needed in the future.

Recommendations for Recovery

The district should:

1. Continue to generate excess leave balance reports regularly as a part of the plan to eliminate 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. Continue to generate an annual report of all leave earned and taken by each employee and in the district as a whole.

Standard Fully Implemented

February 2010 Initial Rating: 2

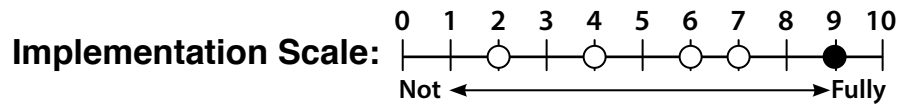
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district is in year five of Program Improvement but demotions and reassignments were not required in 2014-15, and no voluntary transfer requests were made.

Findings

1. The district's year five Program Improvement status did not necessitate demotions or reassignments of management or nonmanagement school staff for the 2014-15 school year.
2. No transfers or reassignments were requested or made for the 2014-15 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

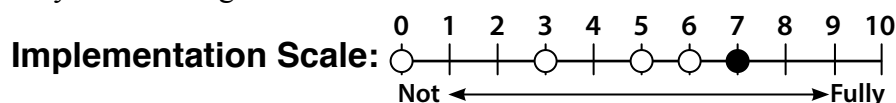
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 6

May 2015 Rating: 7



5.4 Operational Procedures

Legal Standard

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

Summary of Sixth Comprehensive Review, May 2015

The human resources department has fully implemented all elements of this standard and is systematically working to maintain separate personnel and payroll records.

Findings

1. The human resources department has consistently implemented the checklist of annual updates for each type of personnel file. These procedures are systematic, and the department continues to file the appropriate documentation.
2. Required annual notices were sent to all employees at the beginning of the 2014-15 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 is working to separate personnel and payroll records. 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.
6. 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 and 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. Continue efforts to systematically separate payroll and personnel records to ensure compliance with state and federal laws related to privacy, personally identifiable information, and confidentiality.

Standard Fully Implemented

February 2010 Initial Rating: 2

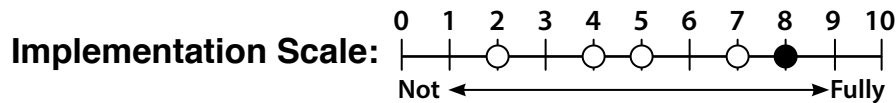
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The human resources department has continued updating department procedures and documenting them in the department reference manual. Since the last reporting period, desk manuals have been developed for the human resources assistant/receptionist and the senior director. The revised department organizational chart identifies backup personnel.

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 senior director of human resources.
2. Some responsibilities previously assigned to the senior director of human resources 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 senior director of human resources 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. In addition to the human resource functions assigned to the senior director of human resources, negotiations, labor relations and employee discipline have been added to the position.
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, processing of personnel requisitions, Americans with Disabilities Act (ADA), pre-employment tests, beginning teacher support and assessment, new employee orientation, performance evaluations, substitute services, and processing of complaints. It also contains a calendar of required monthly human resources activities and best practices.
6. The human resources department remains small. However, the department has developed a department reference manual and desk manuals for the senior director and the human resources assistant/receptionist. The recently updated department organizational chart identifies backup personnel for key human resource functions.

Recommendations for Recovery

The district should:

1. Continue to review and revise the human resources department reference manual as needed. Include this review on the human resources annual calendar.
2. Update the department functions chart as backup personnel for essential human resource functions change and/or as new positions or backups are identified.

Standard Fully Implemented

February 2010 Initial Rating: 0

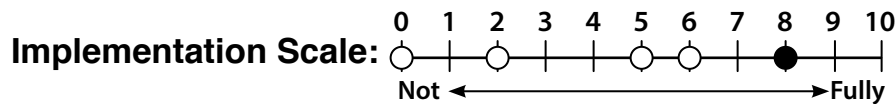
March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The human resources and business departments meet monthly. In addition, the senior director of human resources provided much of the training for the new payroll/benefits specialist, and they continue to meet numerous times per week to discuss personnel and payroll changes.

Findings

1. The state administrator recently revised the district office's organizational chart, moving some key 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 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 hold formal meetings monthly to develop, implement and monitor procedures for resolving payroll errors.
5. The senior director of human resources provided much of the training for the new payroll/benefits specialist, and they continue to meet numerous times per week to discuss personnel and payroll changes.

Recommendation for Recovery

The district should:

1. Ensure that the human resources and payroll departments continue to meet regularly to develop, implement, and monitor well-articulated procedures for resolving payroll errors.

Standard Partially Implemented

February 2010 Initial Rating: 3

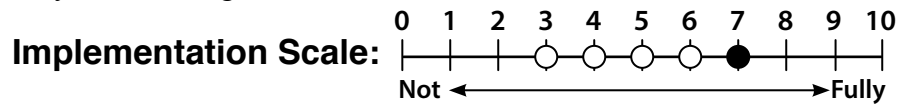
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 Rating: 7



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 Sixth Comprehensive Review, May 2015

Over the last three years, the district has made a significant investment in training and developing of human resources staff, demonstrating that this standard is fully implemented and is being sustained with high quality.

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
 - Pension reform
 - New developments in teacher discipline
 - Employee leaves
 - Credentials
2. The district has invested significantly in the senior director of human resources' 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

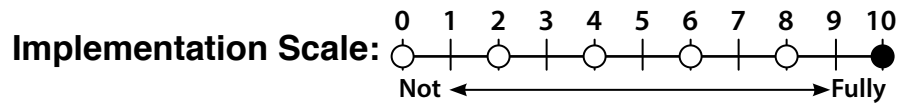
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 8

May 2015 Rating: 10



5.10 Operational Procedures

Professional Standard

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

Summary of Sixth Comprehensive Review, May 2015

The business and human resource departments are working together to make staffing decisions for 2015-16. The state administrator hired an education services director who is working with the human resources and business departments to make staffing decisions that ensure staffing meets instructional needs. The district needs to develop a well-articulated process and timeline for enrollment and staffing projections and implement it annually to ensure that it becomes systematic. Classified staffing formulas are also needed.

Findings

1. 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.
2. The business and human resource departments are working together to make staffing decisions for 2015-16. The state administrator hired an education services director who is working with the human resources and business departments to make staffing decisions that ensure staffing meets the needs of the instructional program.
3. The district needs to develop a well-articulated process and timeline for enrollment and staffing projections and implement it annually to ensure that the process becomes systematic.
4. The district has located and plans to revise classified staffing formulas used a number of years ago. At the time of fieldwork the district's chief business official (CBO) reported that the district was at bare minimum staffing levels in its operational divisions. Staff also reported that, based on the district's LCAP needs assessment, it may be able to use supplemental dollars to improve basic conditions.

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, and 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. Revise classified staffing formulas in the maintenance and operations division and develop a plan to increase staffing levels over time.
5. 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

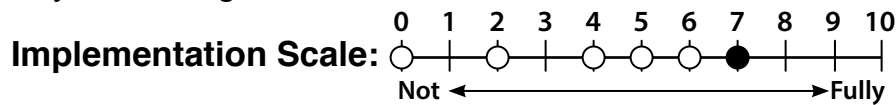
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 Rating: 7



7.1 Use of Technology

Professional Standard

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

Summary of Sixth Comprehensive Review, May 2015

The Escape financial system is fully operational and budget, human resource, and payroll functions are now well integrated. Only authorized and funded positions are advertised and filled. All elements of this standard are fully implemented and are being monitored and are expected to be sustainable.

Findings

1. At the time of FCMAT's fieldwork, the new Escape financial system was fully operational and budget, human resource, and payroll functions are well integrated.
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 continues to be reviewed and updated annually.
3. The district continues to ensure compliance with changes that affect employees, such as the Affordable Care Act and pension reporting rules.

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 regularly and on an ongoing basis to ensure they are being implemented consistently.

Standard Fully Implemented

February 2010 Initial Rating: 0

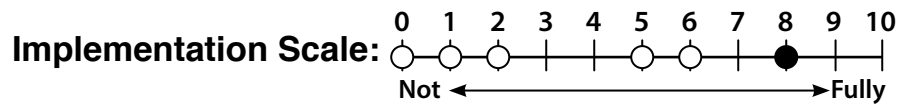
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The Escape financial system is fully operational. Only authorized and funded positions are advertised and filled. All modules of the system but one are fully operational; this has significantly improved internal controls, increased efficiency, and reduced errors.

Findings

1. At the time of FCMAT's fieldwork, the district had fully implemented the Escape financial software system, which is a fully integrated software system that includes general ledger, budget, human resources and payroll modules. All modules except the optional human resources authorizations module are fully operational and have significantly improved internal controls, increased efficiencies, and reduced errors.
2. The human resources and business departments are working to implement the optional HR authorizations module, which will allow the electronic processing of personnel requisitions.
3. The district continues to ensure that only authorized and funded positions are advertised and filled.
4. 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. Continue to work on implementing the human resources authorizations module to further increase efficiencies.

Standard Fully Implemented

February 2010 Initial Rating: 1

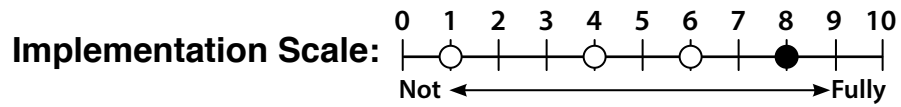
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

Monitoring of certificated and classified evaluations according to negotiated contracts is systematic. The senior director of human resources has provided training to new supervisors on evaluation timelines and procedures, and on the use of a district performance improvement plan.

Findings

1. The senior director of human resources continues to monitor evaluations of certificated and classified management and nonmanagement staff.
2. The senior director of human resources continues to provide administrators with the necessary evaluation forms, communicate evaluation procedures and timelines, and provide new administrators with training in this area.
3. Evaluation dates and employees' status as probationary or permanent will now be maintained in Escape.
4. The human resources department is ensuring that certificated and classified staff evaluations are completed as required by the respective collective bargaining agreements.
5. The state administrator continues to evaluate department directors and school 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 provided school and department administrators with training in using the performance improvement plan, but there are no employees with a performance improvement plan at this time.

Recommendations for Recovery

The district should:

1. Continue to ensure that supervising managers follow the 2014-15 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. Provide annual training in the use of performance improvement plan and hold supervisors accountable for providing struggling employees with meaningful assistance and support.

Standard Fully Implemented

February 2010 Initial Rating: 3

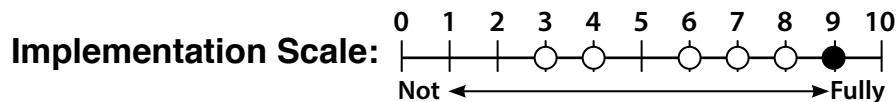
March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district is systematically monitoring evaluations according to negotiated contracts. Evaluations of school and department administrators and of certificated employees continue to be rigorous and are used in making decisions to grant permanent employment status.

Findings

1. Article XV of the collective bargaining agreement with certificated employees provides for an evaluation process and forms for probationary and permanent certificated employees based on the California Standards for the Teaching Profession
2. Article X of the collective bargaining agreement with classified employees, titled Evaluation Procedures, details the evaluation procedures for classified employees.
3. The written procedure for performance evaluations is included in the human resources reference manual. The procedure identifies the roles and responsibilities of the senior director of human resources, 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.
6. The senior director of human resources has provided training to new supervisors on evaluation timelines and procedures, as well as training on the use of a district performance improvement plan.

Recommendations for Recovery

The district should:

1. Ensure that supervising managers continue to follow the 2014-15 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. Provide annual training to 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 Fully Implemented

February 2010 Initial Rating: 1

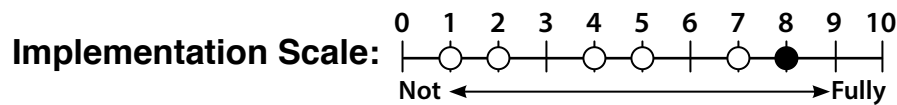
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7

May 2015 Rating: 8



9.2 Employee Services

Professional Standard

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

Summary of Sixth Comprehensive Review, May 2015

The human resources department continues to recognize employees for years of service and supports the You Make a Difference program. The department and employee organizations have developed a new Bring on the Pride employee recognition program that will be implemented during the 2015-16 school year.

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 for the You Make a Difference recognition by site and department administrators during cabinet and administrative council meetings.
3. Honorees receive a handwritten acknowledgement signed by the state administrator.
4. The district continues to provide employees with certificates for years of service.
5. In collaboration with employee organizations, the department has developed a new Bring on the Pride employee recognition program that will be implemented during the 2015-16 school year. The new program will recognize two district employees three times each year.

Recommendations for Recovery

The district should:

1. Continue a program of awards for years of service.
2. Continue to identify and recognize exemplary employees through employee recognition programs.

Standard Fully Implemented

February 2010 Initial Rating: 0

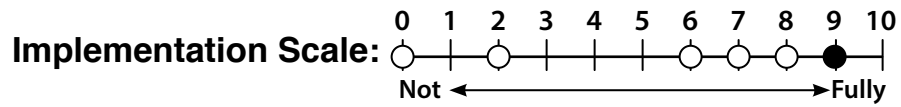
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

In December 2014 the district successfully negotiated new three-year agreements with its certificated and classified employee bargaining units. The district's negotiating team included school site administrators and classified managers.

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. In 2014-15, the state administrator added a classified manager to the classified bargaining team.
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 negotiations, 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 and classified managers are represented on the district's negotiating team.

Standard Fully Implemented

February 2010 Initial Rating: 2

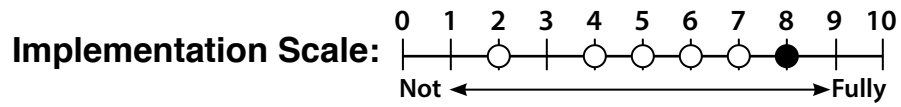
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The district's updating of procedures related to contract management and grievances is systematic, and the human resource department continues to provide site and department supervisors with training and support.

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, has included these procedures in its procedures manual, and is updating them annually.
3. The district continues to provide site and department supervisors with training in contract management and grievance processing at monthly administrative council meetings.
4. The senior director of human resources provided new school administrators with training in contract management and grievance processing, and marked provisions of the agreement that were problematic at their assigned school sites. The new administrators report that the senior director set them up for success and as a result they have been able to avoid any grievances.

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 Fully Implemented

February 2010 Initial Rating: 0

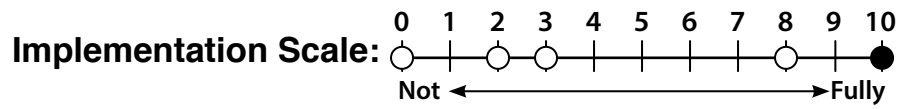
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 8

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The district presented its initial proposals for bargaining with certificated and classified employee groups at a public meeting of the governing board as required by Government Code (GC) 3547(a) and subsequently held a public hearing to give the public an opportunity to express itself regarding the proposals as required by GC 3547(b). 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(a) states:

All initial proposals of exclusive representatives and of public school employers, which relate to matters within the scope of representation, shall be presented at the public meeting of the public school employer and shall thereafter be public records.

This code requires districts to make public the proposals and is presented to the board as an information item. The district made public its initial proposals as required.

The law also requires that a public hearing be held for all initial contract proposals. Government Code 3547(b) states:

Meeting and negotiating shall not take place on any proposal until a reasonable time has elapsed after the submission of the proposal to enable the public to become informed and the public has the opportunity to express itself regarding the proposal at a meeting of the public school employer.

The district held its public hearing at a meeting after making public its initial proposals.

2. 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.
3. The district successfully negotiated a three-year agreement with certificated and classified employee groups. The tentative agreements were sent to the county office of education with the required AB 1200 public disclosures and met with county office approval. The tentative agreements give certificated and classified employees a 9% increase in

compensation over three years. The tentative agreements closed negotiations until 2017-18.

Recommendations for Recovery

The district should:

1. Ensure continued compliance with Government Code 3547(a) by presenting the initial proposals of the employer and the employee organizations at a public board meeting.
2. Ensure continued compliance with GC 3547(b) by holding a public hearing at a subsequent meeting of the governing board to allow members of the public to comment before it adopts the initial proposals for bargaining.
3. 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.
4. 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 Fully Implemented

February 2010 Initial Rating: 0

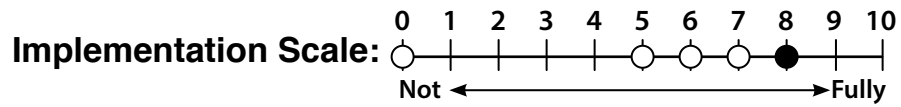
March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 6

May 2015 Rating: 8



Appendix A

Source Documents

Board Policies and Administrative Regulations

1. Adopted May 18, 2014
 - E 4112.9 Employee Notification (revised)
 - AR 4117.14 Postretirement Employment (revised)
 - AR 4117.7 Employment status Report
2. Adopted January 1, 2015
 - BP 4112.2 Certification (revised)
 - AR 4112.2 Certification (revised)
 - BP 4112.21 Interns
 - AR 4112.21 Interns
 - BP 4115 Evaluation Supervision
 - AR 4115 Evaluation Supervision
 - BP 4117.3 Personnel Reduction

Documents

3. SMCJUHSD Human Resources Department Mission Statement, Vision, and Guiding Principles
4. Human Resources Department Goals: 2014-2015
5. Human Resources Progress Report 2014-2015
6. (5) Friday Updates to the Board – Info on what is happening in HR Dept.
7. SMCJUHSD Organization Chart 2014-2015
8. District Leadership Responsibilities Chart
9. SMCJUHSD Senior Director, Human Resources Job Description
10. 2014-2015 Data Submission Calendar for CALPADS, CBEDS-ORA, and CARS
11. SMCJUHSD – Misassignments/Suggested Solution
12. School District Assignment Monitoring and Review Report

13. 2014-2015 KCHS Master Schedule
14. 2014-2015 GHS Master Schedule
15. 2014-2015 KCHS Master Schedule
16. 2014-2015 GHS Master Schedule
17. Uniform Complaint Procedures
18. Uniform Complaint Procedures Policy
19. Recruitment Plan – Teachers
20. 2014-2015 SMCJUHSD Recruitment Budget
21. SMCJUHSD Teacher Recruitment Plan
22. Teacher Recruitment hiring procedures
23. Classified Employees Hiring Process
24. SMCJUHSD Certificated Employment Application
25. SMCJUHSD Classified Employment Application
26. Copies of communication with Universities regarding job vacancies
27. Business Technician Test and Interview Questions
28. District Secretary Test and Interview Questions
29. Instructional Aide Test and Interview Questions
30. Maintenance Worker Test and Interview Questions
31. Parent Involvement Coordinator Test and Interview Questions
32. Technology Assistant Test and Interview Questions
33. Parent Involvement Coordinator Test and Interview Questions
34. Technology Assistant Test and Interview Questions
35. Teacher Recruitment/Hiring Procedures
36. Classified Employees Hiring Process

37. Sample interview questions: Classified/Certificated
38. Sample Classified IA test
39. Employee Reference Check-Certificated
40. Employee Reference Check-Classified
41. (3) Copies of Interviews and Reference check for Certificated staff
42. (3) Copies of Interviews and Reference checks for Classified staff
43. Evidence of Training for hiring panel: Preparing Interview Panel Assistant Principal job announcements on Edjoin
44. CALSA Assistant Principal announcement
45. Assistant Principal Interview copies
46. Assistant Principal Job Description
47. 2014-2015 Classified Evaluation schedules
48. 2014-2015 Certificated Evaluation Schedules SMCJUHSD
49. Keenan Safe Schools Training staff completions: Sexual Harassment: Staff-to-Staff (Certificated/Classified)
50. SMCJUHSD Keenan Safe Schools Training staff
51. completions: Sexual Misconduct: Staff-to-Student (Certificated/Classified)
52. SMCJUHSD Keenan Safe Schools Training staff completions: Sexual Harassment: Policy and Prevention (Administrators)
53. Sexual Harassment Board Policy
54. SMCJUHSD Keenan Safe Schools Training Staff completions: All assigned trainings (Include: Child Abuse reporting, blood-borne pathogens, Sexual Harassment, and other legally required trainings)
55. Nondiscrimination in Employment Board Policy
56. SMCJUHSD Certificated Required Notices/Policy Notices: Initial and return sheet
57. SMCJUHSD Classified Required Notices/Policy Notices: Initial and return sheet

58. Uniform Complaint Procedures Policy
59. New Teacher Orientation Handbook 2014-2015
60. Employee Handbook
61. Substitute Teacher Handbook
62. Copies of Substitute Teacher signed Acknowledgement forms
63. Certificated Employees Required Notices 2014-2015
64. Classified Employees Required Notices 2014-2015
65. Report of Absence - Certificated
66. Report of Absence - Classified
67. 2013-2014 Vacation payouts
68. 2013-2014 Certificated leaves report
69. 2013-2014 Classified leaves report
70. 2014-2015 Certificated leaves report (7/2014 - 12/2014)
71. 2014-2015 Classified leaves report (7/2014 - 12/2014)
72. Local Educational Agency (LEA) Plan
73. Human Resources Reference Manual
74. Human Resources Reference Manual: Non-Management
75. Several Emails Between CBO, HR, & Payroll

Workshop and training registration confirmations, agendas, and materials

76. Affordable Care Act Workshop, MCOE, October 14, 2014
77. 36th Annual Fall Conference, Credential Counselors & Analyst of California, October 15-17, 2014
78. Tri County Personnel Director Meeting, MCOE, October 23, 2014
79. New Developments in Teacher Discipline, Lozano Smith, November 12, 2014

80. Supplementary Application Forms, MCOE Escape Training, December 3, 2014

CalSTRS, CalPERS, PEPRA Workshop, MCOE, December 11, 2014

81. Registration confirmation for CODESP Assessing Job Fit and Conducting Job Analysis workshops to be attended by the senior director of human resources on February 18 and March 4, 2015

Personnel Files

82. Five randomly selected certificated nonmanagement personnel files

83. Five randomly selected classified nonmanagement personnel files

84. Three randomly selected certificated management personnel files

85. Three randomly selected classified management personnel files

Appendix B

Positions Interviewed

1. State trustee
2. Senior director of human resources
3. Chief Business Officer
4. Education Services Director
5. Director of technology
6. Director of maintenance, operations, and transportation
7. Payroll/benefits technician
8. Members of the management negotiating team
9. 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	May 2015 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	10
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	9
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	8
1.4	PROFESSIONAL STANDARD – ORGANIZATION AND PLANNING The personnel function head is a member of the Superintendent's cabinet and participates in decision making early in the process.	0	4	6	6	8	10

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
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	8
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	9
3.9	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION The personnel function has a recruitment plan based on an assessment of the LEA's needs for specific skills, knowledge, and abilities. The LEA has established an adequate recruitment budget. Job applications meet legal and LEA needs.	0	2	4	6	7	8
3.11	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION Selection procedures are uniformly applied. The LEA systematically initiates and follows up and performs reference checks on all applicants being considered for employment.	3	4	5	7	9	10

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
3.12	PROFESSIONAL STANDARD – EMPLOYEE RECRUITMENT/ SELECTION The LEA recruits, selects, and monitors principals with strong leadership skills, with a priority on placement of strong leaders at underperforming schools.	0	2	5	6	6	8
4.3	LEGAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT The LEA has developed a systematic program for identifying areas of need for in-service training for all employees. The LEA has established a process by which all required notices and in-service training sessions have been performed and documented such as those for child abuse reporting, blood-borne pathogens, drug and alcohol-free workplace, sexual harassment, diversity training, and nondiscrimination. (cf. 4112.9/4212.9/4312.9), GC 11135 EC 56240, EC 44253.7)	0	2	6	8	9	10
4.5	PROFESSIONAL STANDARD – INDUCTION AND PROFESSIONAL DEVELOPMENT Initial orientation is provided for all new staff, and orientation materials are provided for new employees in all classifications: substitutes, certificated and classified employees.	2	4	6	7	8	10

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
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)</p> <p>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	9
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	7
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	8
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	8

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
5.7	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES The personnel function has procedures in place that allow for both personnel and payroll staff to meet regularly to solve problems that develop in the processing of new employees, classification changes, employee promotions, and other issues that may develop.	3	3	4	5	6	7
5.8	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Personnel staff members attend training sessions/workshops to keep abreast of best practices and requirements facing personnel administrators.	0	2	4	6	8	10
5.10	PROFESSIONAL STANDARD – OPERATIONAL PROCEDURES Established staffing formulas dictate the assignment of personnel to the various sites and programs.	0	2	4	5	6	7
7.1	PROFESSIONAL STANDARD – USE OF TECHNOLOGY An online position control system is utilized and is integrated with payroll/financial systems.	0	1	2	5	6	8

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
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	8
8.1	<p>LEGAL STANDARD – EVALUATION/DUE PROCESS ASSISTANCE</p> <p>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	9

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
8.3	<p>PROFESSIONAL STANDARD – EVALUATION/DUE PROCESS ASSISTANCE</p> <p>Management has the ability to evaluate job requirements and match the requirements to the employee’s skills. All classified employees are evaluated on performance at least annually by a management-level employee knowledgeable about their work product. Certificated employees are evaluated as agreed upon in the collective bargaining agreement and California Education Code. The evaluation criteria are clearly communicated and, to the extent possible, measurable. The evaluation includes follow-up on prior performance issues and establishes goals to improve future performance.</p>	1	2	4	5	7	8
9.2	<p>PROFESSIONAL STANDARD – EMPLOYEE SERVICES</p> <p>The personnel function has developed recognition programs for all employee groups.</p>	0	2	6	7	8	9
10.2	<p>PROFESSIONAL STANDARD – EMPLOYER/EMPLOYEE RELATIONS</p> <p>The personnel function provides a clearly defined process for bargaining with its employee groups that involves site-level administrators.</p>	2	4	5	6	7	8

Personnel Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 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
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	8
Collective Average Rating		0.92	2.69	4.27	5.88	7.15	8.61

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)

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 move to the schools and become more effective. The schools and their site councils are more informed and in better control of their ability to structure funding for the plans they have developed.
3. Site council members were identified and put in place last spring and had little to no opportunity to be involved in planning for the implementation of categorical programs and funding priorities for the 2014-15 school year.
4. Some school site council agendas and minutes have been posted on the district's website.
5. The local educational agency (LEA) plan was revised and updated before the start of this school year.
6. The district and schools continue to make 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 SSCs in a format that parents, staff and community members can easily understand. Ensure that schools and their site councils develop budgets before the beginning of school each year and that they are monitored during the fiscal year.
2. Annually review timelines that identify deadlines and dates for the following:
 - Categorical budget development
 - LCAP development
 - Schools' implementation of categorical support and school site council selections
 - School site council meetings
 - Trainings for school site councils and appropriate staff
 - The analysis of 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 all school site council agendas are posted online and that minutes are available online in a timely manner.
5. Continue to increase parents' attendance and participation in meetings such as school site council.
6. Continue to ensure that the single plans for student achievement (SPSAs), the LCAP, 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

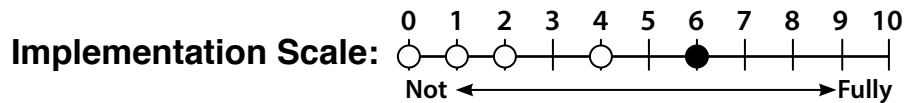
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 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.

Findings

1. The LEA plan, approved on June 18, 2014, includes the following vision statement, mission statement 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 district continues to share the vision and mission statements with staff and the community. For example, both the vision and mission statements are included on the district's website. The vision statement does not explicitly address closing the district's achievement gaps, and gaps continue to exist between demographic subgroups of students. For example, in 2013-14, 86% of white tenth grade students passed the English language arts portion of the California High School Exit Exam (CAHSEE), while only 66% of Hispanic or Latino tenth graders passed that section of the CAHSEE. There was also a gap between these subgroups in mathematics scores on the CAHSEE for the same year, with 86% of white students passing and 72% of Hispanic or Latino students passing.
3. The district continues to provide some support for struggling students, such as after-school tutoring or credit recovery. However, teachers indicated they need additional strategies to help struggling students before they fail.
4. The district's mission and vision support high expectations for student achievement, but efforts to operationalize those expectations are still being implemented. High expectations for students are seldom reflected in observable instructional strategies or academic outcomes. Closing the achievement gap is not identified as one of the district's priorities.

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 its vision and goals expressly include the goal of narrowing the achievement gap between subgroups.

Standard Partially Implemented

February 2010 Initial Rating: 1

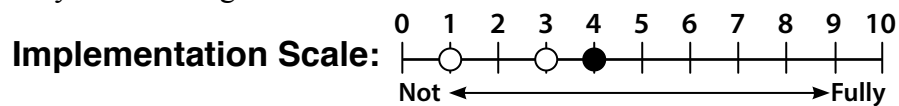
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 4



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.

Findings

1. Administrators and teachers are engaged in ongoing efforts to improve student achievement.
2. The district is in its third full year of weekly collaboration days. The expectations, planning, and outcomes for these days continue to become better coordinated between the two comprehensive high schools. High expectations for student achievement is a focus of the district but is still in the implementation phase and is seldom reflected in observable instructional strategies and academic outcomes.
3. Analysis of student achievement data has declined since the previous review because the district has stepped away from its adoption of Aeries Analytics as a data analysis tool. The district is finalizing the decision of which software to use for analysis of student data.
4. There is little continuity in most administrative positions throughout the district: The administration at Greenfield High School is new; King City High School has remained the same, except that the assistant principal is only available 20% of the time because he also serves as the interim principal at Portola-Butler Continuation High School. The district is changing the administrative leadership of special education, and there is a new director of educational services for the district, replacing the person who served in that position last year.
5. Procedures for evaluations of administrators are in place and being used. Forms and measurement objectives are aligned with instructional expectations and districtwide improvement efforts.
6. The district's curriculum council has been in place for many years and is slowly becoming more effective as a productive resource for planning and implementing academic improvements.
7. The alternative education program at Portola-Butler Continuation High School is undergoing a WASC accreditation review this spring. Greenfield High School will undergo a WASC accreditation review in 2016, and King City High School will do so in 2017.
8. Development of common benchmarks in subject areas continues to grow. Collaboration between the schools is improving, and this school year the emphasis is on interactions between the two math departments.

9. Classroom observations (also known as walkthroughs) are becoming part of the district's educational culture. Feedback to teachers on walkthroughs is minimal, however, and full implementation and use of a database program to record walkthrough information has yet to be finalized.
10. King City High School has a full-time instructional coach for six periods each day, and Greenfield High School uses a .25 full-time equivalent (FTE) instructional coach. There is no instructional coaching support for the alternative education program.

Recommendations for Recovery

The district should:

1. Continue the coordination and cooperation between school sites and the district in planning collaboration days and expected outcomes.
2. Select and use a data analysis tool that provides easy-to-use analysis of student achievement data along with a bank of assessment questions. Develop a comprehensive plan for how the evaluated data will help improve instruction and ultimately improve academic achievement.
3. Develop a training schedule for the selected database system to quickly train teachers and staff how to use the software to analyze student achievement data.
4. Continue to use the significant number of available and ongoing reports (WASC, FCMAT, and Federal Program Monitoring), plans (LCAP, LEA, Title III, SPSAs) and student achievement data available to establish common instructional practices that improve student achievement and focus on learning outcomes.
5. Continue efforts to further develop a districtwide plan to create and implement common assessments in additional subject areas.
6. Provide districtwide professional development in using data to influence and shape instruction, always differentiating for struggling students.
7. Develop plans and strategies to help low-performing students so that it can continue to reduce the large number of recovery courses needed each school year.

Standard Partially Implemented

February 2010 Initial Rating: 1

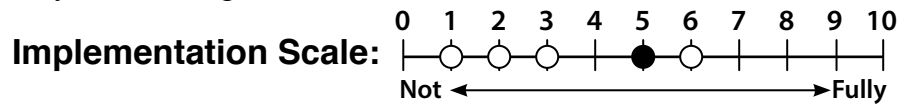
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 5

May 2015 Rating: 5



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.

Findings

1. The district does not have a current Title III improvement plan. For the LEA plan to qualify for this improvement plan, it must contain all of the required information including cost estimates, related expenditures, funding source, timeline, and personnel responsible for each activity. Goal 2 of the LEA plan, regarding English language proficiency, does not include estimated costs, related expenditures, funding resource, timeline, or personnel responsible.
2. The district's Board Policy 6011(a) addresses aligning student achievement outcomes with instructional goals and the need for fiscal support.
3. The LEA plan has been updated to include the district's 2014-15 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.
4. Greenfield High School updated its SPSA before the start of the school year and included funding sources, dollar amounts, and the person or persons responsible for each activity. Portola-Butler Continuation High School's plan was updated as well, with some items left blank in the sections estimating cost and funding source. King City High School's plan was approved at the school and district level with many items left blank in the areas of school goals, metrics, and cost or funding source; the plan had not been updated at the time of FCMAT's fieldwork in February 2015.
5. School site council members reported that they had little opportunity to provide input on the budget before it was presented to them for approval.
6. Departments do not receive budgets, and there is no consistency regarding which requests for materials and supplies get approved or denied.

Recommendations for Recovery

The district should:

1. Ensure school site budget development and management that facilitates program implementation at the start of the school year to maximize benefits for students. Have systems in place to review the budget and evaluate program effectiveness throughout the school year, making adjustments as needed.

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 LCAP, LEA plan and other school and district plans to improve student achievement.
3. Ensure that all SPSAs are complete before school site council and board approval. In addition, ensure that school site council members have adequate time to provide input and suggest revisions before final approval.
4. Continue to 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 its 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 the LEA plan can function as the Title III Improvement plan by making certain it includes all cost estimates, related expenditures, funding source, timeline, and personnel responsible for Goal 2 for students with limited English proficiency.
6. Ensure that district and school leadership teams review the LCAP and 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 LCAP and LEA plan.
7. Ensure that the LCAP, 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 involved and are posted on the district's and the schools' websites.

Standard Partially Implemented

February 2010 Initial Rating: 0

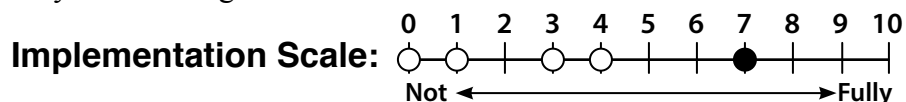
March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 7

May 2015 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.

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 LCAP, LEA plan and the SPSA for each school site.
2. The district's LCAP and LEA plan were approved in June 2014, and both address the fundamental components of a sound instructional program. The LCAP and LEA plan have been revised to show current goals, outcomes, and updated student achievement data. The district has aligned the LEA plan with student achievement plans including SPSAs, professional development plans, WASC and others.
3. The King City High School SPSA was approved in June 2014 with items left blank for goals, metrics, and cost or funding source, and had not been revised at the time of FCMAT's fieldwork in February 2015.
4. School site councils are meeting regularly but attendance continues to be low, especially among parent members.
5. School site council agendas and minutes show that the councils have reviewed and approved the SPSAs. The school site councils received training as required by both board policy and state regulations. However, council members continue to report that they are not included in budget development and only see the budget when they are asked to approve the plan.
6. School site council members and parents indicated that they would like to be more actively involved and included in more decisions. They want more parent participation and think more parents would attend if parents had a more meaningful role.

Recommendations for Recovery

The district should:

1. Ensure that school leaders and staff have the support and resources needed to successfully implement the district's goals.
2. 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 responsible for implementing the activity. Regularly include on each school site council's

agenda a review of progress in implementing the SPSA, and make revisions as needed based on the needs of the school.

3. Continue to provide professional development for all staff in analyzing student achievement data to improve instruction to better meet the needs of struggling students. Use the Academic Program Survey (APS) results so that staff can participate in developing the SPSAs and implement the plans effectively.
4. Continue to launch and convene school site councils in spring for the following year to help implement SPSAs at the start of the school year. Ensure that there are enough council meetings to effectively monitor progress in implementing the SPSA.
5. Make every effort to meet the needs of parents who are school site council members to improve their attendance and active participation. Have parent coordinators call to personally invite parents to the meetings in advance, and then a reminder phone call the day before. Provide agendas prior to meetings, and ensure that accommodations for limited- and non-English speakers are consistent.
6. Continue to provide leadership for and monitor collaboration time to ensure that the focus is on student achievement. Encourage professional learning community (PLC) lead teachers to provide direction and stability to this process. Provide agendas in time for teachers to prepare for weekly meetings, and have school administrators give feedback on the minutes to support the work done during this time.

Standard Partially Implemented

February 2010 Initial Rating: 1

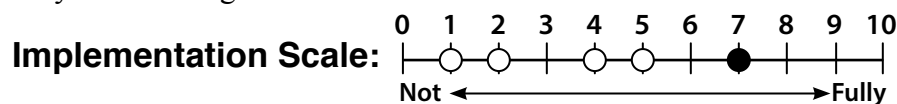
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 7

May 2015 Rating: 7



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.

Findings

1. During the previous comprehensive review, the district indicated it had selected Aeries Analytics for data analysis and was training staff on this system. At the time of the current review, the district had stopped its transition to Aeries Analytics and was selecting a different data analysis tool.

District administrators, school administrators and teachers stated that many of the district and school staff found Aeries Analytics too difficult to use, and the consensus was that this tool was not a good fit for the district. Teachers and administrators indicated that currently different staff members use different methods for data analysis, including doing it by hand or using Microsoft Excel. Teachers and administrators also indicated it is more difficult to perform data analysis without a standard tool.

2. The district continues to use the Aeries student information system to store student enrollment and demographic information. District and school staff members continue to use and rely on the data stored in the student information system.
3. Professional development related to analyzing and using data occurs primarily during teacher collaboration time. Teachers and administrators reported collaboration time is still structured, but teachers have more opportunity to shape their collaboration than in the 2013-14 school year. During department collaborations, teachers continue working on Common Core implementation, preparing for the new state assessments, developing or updating benchmark assessments, and analyzing student data. Math teachers reported that in addition to benchmark assessments they are now working together to develop smaller more specific quizzes to assess specific skills. Their collaboration on the results from these quizzes is having a greater impact on teaching practice than collaborations did in prior years.
4. Implementation of Constructing Meaning remains the district's primary strategy for helping English learners. The district continues to provide a coach to help teachers at the comprehensive high schools in this process, although there was a significant difference in the amount of coaching support provided at each school. King City High School has a full-time coach this year, whereas Greenfield High School only has a .25 FTE coach, and Portola-Butler Continuation High School does not have a coach to assist teachers. The district has not collected and analyzed data on the impact of Constructing Meaning to determine the effect of these strategies on student learning.

5. The state administrator has assigned school administrators to spend 55 minutes per day on classroom observations. School administrators reported that although this goal may not be met every day, they are conducting classroom observations regularly.
6. Administrators and teachers indicated the district continues to use the results of state assessments (CAHSEE and California English Language Development Test (CELDT)) to place students in classes; however, they also reported using other data, including the Scholastic Reading Inventory (SRI) reading test, teacher recommendations, and class grades, when placing students.

Recommendations for Recovery

The district should:

1. Identify a data analysis tool that meets the district's needs, and train administrators and teachers to use it.
2. Continue to support a team of district and school 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 improvements in teaching practice are implemented and refined over time.

In addition, ensure teachers and administrators visit 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 improvement.

3. 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.
4. Continue to provide teachers and administrators with professional development training in the effective use of data and analysis for improving teaching and learning. This training needs to be part of a comprehensive staff development package so the results of the analysis can be applied in the classroom effectively and in a timely manner.
5. Collect and analyze data on the impact of Constructing Meaning strategies on student learning.
6. 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 this investment of time results in a significant improvement in student achievement.

Standard Partially Implemented

February 2010 Initial Rating: 2

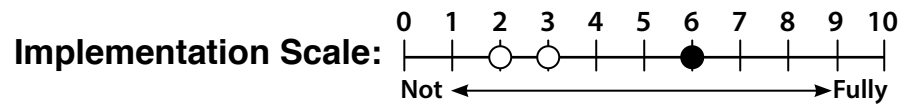
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 6

May 2015 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.

Findings

1. The district continues to use the adopted teacher evaluation process. The evaluation form addresses the following standards:
 - Standard I: Engaging and Supporting All Students in Learning
 - Standard II: Creating and Maintaining Effective Environments for Student Learning
 - Standard III: Understanding and Organizing Subject Matter for Student Learning
 - Standard IV: Planning Instruction and Designing Learning Experiences for All Students
 - Standard V: Assessing Student Learning
 - Standard VI: Developing as a Professional Educator
 - Standard VII: Student Progress Toward the Attainment of Academic Standards
 - Standard VIII: Fulfilling Professional Responsibilities
2. The district has also developed an administrative evaluation process to hold administrators accountable. This process includes evaluation on the following domains:
 - Domain 1: A Data-Driven Focus on Student Achievement
 - Domain 2: Continuous Improvement of Instruction
 - Domain 3: A Guaranteed and Viable Curriculum
 - Domain 4: Cooperation and Collaboration
 - Domain 5: School Climate
3. School administrators continue to monitor teachers' implementation of Constructing Meaning strategies through classroom observations (also known as walkthroughs). However, administrators are not providing feedback to teachers following these walkthroughs, and at the time of FCMAT's fieldwork the results of the walkthroughs were not contributing to efforts to improve student achievement.
4. The district is holding school administrators accountable for completing walkthroughs by requiring weekly summaries of the classroom observations. The district provided professional development to school administrators on conducting walkthroughs. Administrators are to spend 55 minutes per day on walkthroughs. The principal at Greenfield High School reported meeting this goal. The principal at King City High School is striving to meet this goal but reported some days it is not possible because the assistant principal has been temporarily assigned as the interim principal of Portola-Butler Continuation High School.

5. The district did not meet any of the Title III accountability annual measurable achievement objectives (AMAOs) for 2013-14. Coaches are available to support teachers in meeting the needs of English learner (EL) students and in implementing Constructing Meaning strategies. A full-time coach is available at King City High School; a .25 FTE coach is available at Greenfield High School; and Portola-Butler Continuation High School has no coach to assist teachers. Coaches provide professional development, conduct model lessons, and provide feedback on classroom observations. Teachers reported the coach was very helpful but expressed a desire for more effective strategies to help English learners and struggling students. Data is not collected and analyzed on the impact of Constructing Meaning strategies or on how thoroughly and consistently these strategies are implemented.
6. The district holds school administrators responsible for effective use of teacher collaboration time. Teachers indicated improved use of collaboration time this year.
7. Board members also spend time doing classroom observations. The board has set a goal for the five board members to spend a combined total of 100 hours per year in the classrooms. Each board member tries to visit classrooms once or twice a month. The board is looking for increased rigor in the classrooms.
8. The district has developed a professional development plan for 2014-15 and has increased the amount of professional development provided to teachers this year. School site plans are generally aligned with the district plans. The Greenfield High School SPSA was approved before the start of the school year and included all required components, including estimated cost and funding source. Portola-Butler Continuation High School's SPSA was missing some information under estimated cost and funding source. The King City High School SPSA was approved in June 2014 with blank fields for goals, metrics, costs and funding sources. This information had not been added to the plan at the time of FCMAT's fieldwork in February 2015.
9. See related standard 5.1.

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 the district has provided.
2. Continue to implement the evaluation process for teachers, and the new evaluation process to hold administrators accountable for student achievement.
3. Continue to require school administrators to conduct classroom walkthroughs daily, and encourage administrators to provide feedback to teachers following the walkthroughs.
4. Analyze data on student outcomes and classroom observations, including data on how well Constructing Meaning strategies are being used, 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. Increase access to coaches at Greenfield High School and Portola-Butler Continuation High School to ensure all teachers who need coaching support have equitable access to a coach.
6. Continue to hold school administrators accountable for developing and using SPSAs that include specific, measurable student-focused goals aligned with the LEA plan and the district's goals and priorities. Hold teachers and school administrators accountable for developing and implementing intervention strategies when their school's goals are not being met.

Standard Partially Implemented

February 2010 Initial Rating: 0

March 2011 Rating: 1

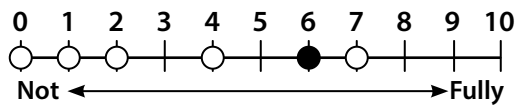
March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 7

May 2015 Rating: 6

Implementation Scale:



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)

Findings

1. The district provides 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 the availability and use of board-approved textbooks and supplemental materials in the classroom. However, some science textbooks are more than eight years old and thus are 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. Examine the value and quality of intervention materials and their use by reviewing data on the progress of underperforming students. This review should ensure that the materials provide these students with effective assistance that closes the achievement gap.
2. Review approved textbooks based on publication dates and set priorities for purchasing new materials based on the greatest need. Strive to acquire science textbooks aligned with the Next Generation Science Standards (NGSS). When considering purchase of English language arts and math textbooks, ensure alignment with Common Core State Standards (CCSS). Once priorities have been established with a timeline for purchasing new textbooks, ensure that the purchase is shown in the LCAP, LEA plan, and budget.
3. Continue to develop and implement a districtwide process to monitor the use of assigned instructional and intervention materials selected for specific courses and the extent to which they have been implemented. Hold teachers accountable for using assigned

materials. Ensure that instructional materials use is included in the protocols for classroom observations. When purchasing new instructional materials, administrators should participate in the same training as the teachers to gain an understanding of what full implementation and their expectations for it should be.

4. 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.
5. 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

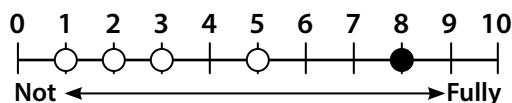
March 2012 Rating: 3

March 2013 Rating: 5

June 2014 Rating: 8

May 2015 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.

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 these changes rapidly enough to meet the urgent need to improve student achievement. The district has hired a new director of educational services since the last review. The new director is knowledgeable and is working diligently to lead the district to improvement.
2. The LEA plan is being used to provide direction to closely align curriculum, instruction and assessment with standards, frameworks and standards-aligned instructional materials. The plan has been updated for 2014-15.
3. King City High School's SPSA for 2014-15 was approved without goals, metrics, cost or funding source and had not been revised as of the FCMAT's February 2015 fieldwork.
4. School administrators and teachers continue to receive training regarding the Common Core State Standards and have begun implementing these across various content areas.
5. The district is in its third year of implementing Constructing Meaning, a districtwide plan to improve language acquisition for English learners. However, a significant achievement gap remains for English learners. School administrators are regularly walking through classrooms to measure the level of implementation but are not providing any direct feedback to teachers.
6. Only 10% of the 40 classrooms FCMAT observed had a clear language objective, and only nine required students to respond in complete sentences and to use academic language when appropriate. The teacher modeled appropriate language in 83% of classrooms observed, while only 23% demonstrated structured interaction with opportunities for students to practice their language acquisition skills.
7. Staff report collaboration time is being used effectively and provides valuable support for alignment efforts by providing opportunities for teachers to make connections across programs, content areas, and school sites. Staff find it helpful to have the annual calendar that shows the collaboration time. Some teachers reported that they need the data analysis software to help them look at student outcomes.

8. 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 two schools. However, there is evidence that teachers are not implementing these strategies in their classrooms consistently. The district has developed a walkthrough protocol to help monitor implementation, but there is no direct feedback to teachers on what administrators observe and how to improve instruction.
9. The curriculum council meets quarterly and includes representatives from the district and both comprehensive high schools. This group's discussion topics include new courses, revised courses, and A-G (the requirements for admission to University of California and California State University schools) certification. Any member can suggest agenda items. This is an opportunity for leadership development and growth.

Recommendations for Recovery

The district should:

1. Continue to use the curriculum council's activities to promote opportunities for teachers to take on leadership roles.
2. Continue to ensure that a plan to better serve English learners includes alignment with the LCAP, LEA plan, SPSAs, professional development plans, economic impact aid (EIA), Title I, and Title III requirements. Use data on student outcomes to evaluate the effectiveness of the Constructing Meaning program.
3. Develop a process for administrators to provide direct feedback to teachers about what they observe during walkthroughs. This feedback should always focus on improving instructional delivery. Ensure that teachers are consistently using Constructing Meaning strategies in classrooms with EL students. Continue to structure and monitor collaboration time, using teachers as PLC leads to provide direction and stability to this process.
4. Continue to use state tools such as the following to assess schools' and the district's structures and supports for strong instructional programs:
 - Academic program survey (APS), for schools
 - District assistance survey (DAS), for district use
 - English learner subgroup self-assessment (ELSSA), for district use
 - Inventory of services and supports (ISS), a district tool for support of students with disabilities
5. Ensure that district and school leadership teams (teachers, administrators, parents and other staff) and school site councils meet at least quarterly to monitor implementation of the LCAP, LEA plan and the SPSAs.

6. Continue to ensure that the LCAP, LEA plan and SPSAs are developed using a collaborative process that includes administrators, teachers, parents, students, community members, and other appropriate staff.
7. Ensure that plans contain all required information before they are finalized and approved at the school and district level.
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

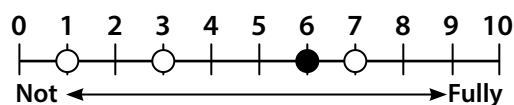
March 2012 Rating: 3

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 6

Implementation Scale:



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.

Findings

1. The district has developed some common assessments in English and math through collaboration between the school sites. Progress has also been made in other core content areas but is not complete.
2. The new Aeries Analytics data management enables users to share student achievement data, but staff report that it is difficult to use and there is no consistency in how it is being used.
3. The district is choosing a new data management system to implement for the 2015-16 school year. It is focusing on software that is easy to use, has the ability to build assessments from a data bank of questions, can create reports, is able to analyze data reports, and has a parent portal.
4. Collaboration time has become consistent districtwide; students have an early release day every Wednesday. Teachers at both comprehensive high schools dedicate time to reviewing student data. Teachers reported that the collaboration is more structured and allows for departments to create common assessments, analyze data related to those, and discuss individual students.
5. The district is using data to more appropriately place students. For English learners, the district has created an EL placement chart to help with this process.
6. Instructional coaches work with EL liaisons and are increasing teacher awareness of CELDT language levels. CELDT language levels are provided to all teachers so 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. When it purchases the new data management system, provide systematic training for administrators and teachers before the school year begins so that it can be effectively implemented and used from the start of the 2015-16 school year. Once it is implemented, provide a training and/or communication to parents on how to easily access their student's information.

2. Fully implement a districtwide system of benchmark assessments and smaller interim assessments 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). All data should be available in the new data management system and used for data analysis during collaboration.
3. Consult with the California School Boards Association (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.
4. Ensure that the common formative and summative assessments being developed are districtwide by course, based on identified essential content standards for each course, include the range of formats found in the California Assessments of Students Performance and Progress (CAASPP), and are administered using an agreed-upon pacing guide or calendar.
5. Ensure that all common assessments are loaded into the new data management system for easy disaggregation and analysis of data. Class rosters should be posted in the new system before the first common assessments are administered.
6. Ensure that the results of the common assessments are analyzed by collaborative teams of teachers and are used to improve instruction for all students.
7. Require and use one data management system 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.
8. Continue to use multiple sources of data to determine the placement of students in courses and/or interventions. Any single source of data, like CELDT or CST, is not reliable or sufficient for determining an individual student's instructional level or course placement.
9. Continue to analyze CAHSEE results and use this analysis to provide targeted assistance based on a student's proficiency level.
10. Continue to structure PLC collaboration time and make it 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

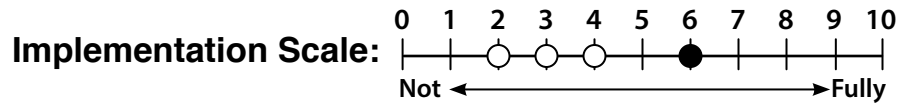
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 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.

Findings

1. FCMAT observed teachers' use of technology for instruction and use of graphing calculators in many mathematics classes. Teachers make effective use of overhead projectors and whiteboards to share their work and instructional materials with students. Overhead projectors were installed in classrooms at Greenfield High School over the summer, so now teachers at both comprehensive high schools have projectors. Computers are used for credit recovery work at the comprehensive high schools and at the alternative school. Students also use technology in computer classes. FCMAT observed minimal student use of technology in other classrooms at the comprehensive high schools.
2. The district has an approved technology plan for July 1, 2013 to June 30, 2016. District staff reported the district has replaced more than 300 outdated computers in the past year, but indicated the district is not monitoring implementation of the technology plan.

Recommendations for Recovery

The district should:

1. Ensure all school sites have equitable access to technology.
2. Establish common expectations regarding teachers' use of technology for teaching and learning, and provide the professional development and support teachers need to implement the technology plan.
3. Ensure the alternative education school has sufficient Internet access to meet its needs.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

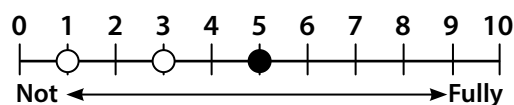
March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5

May 2015 Rating: 5

Implementation Scale:



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)

Findings

1. The district has placed one full-time equivalent (FTE) instructional coach at King City High School, one .25 FTE instructional coach at Greenfield High School, and no instructional coach at Portola-Butler Continuation High School. The instructional coach focuses on ensuring that English learners are assessed and placed in the correct classes for their needs. 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 and administrators in Constructing Meaning (a research-based program designed for secondary English learners). During classroom visits, only a few teachers were observed using these strategies. Administrators acknowledged that even though administrators and instructional coaches are monitoring the level of implementation in the classroom, use of Constructing Meaning strategies remains inconsistent across classrooms.
3. FCMAT observed 40 classrooms and found that one teacher used seven of the eight English learner (EL) strategies on the observation protocol. This is a significant decrease from the previous review. Very few instructional strategies were being used in content area classrooms to support EL students. The use of strategies to improve and accelerate learning for EL students is not sufficient to significantly increase these students' achievement.
4. The district is targeting EL students as its priority for Title I Supplemental Educational Service (SES) tutoring services.
5. Both the district English learner advisory committee (DELAC) and the English learner advisory committee (ELAC) are functioning and their members have received training.
6. The district did not produce any testing results showing significant gains in student achievement and/or significant progress in closing the gap for EL students and students with disabilities.
7. FCMAT observed six English language development (ELD) and specially designed academic instruction in English (SDAIE) classrooms. Student-guided instruction with prompted practice was the primary strategy used in all but two classes. In one of these two classes the teacher used a variety of strategies, including numerous opportunities for interaction with other students and the teacher, during which students

would practice their oral language skills. The other class had students working individually with very little interaction or practice of oral skills. Only two of the six classes observed could be identified as intervention for English learners.

8. The number of EL students that have been redesignated as fluent has increased. The EL instructional coaches and EL liaisons have made this a focus of their work.
9. Special education teachers are co-teaching at one school and have aide support to better accommodate mainstreamed special education students. Both special and regular education teachers were positive about using this method.
10. The district is once again making available the Parents Institute for Quality Education (PIQE) program, which helps parents learn more about how they can help their student(s) be more successful in school. Staff report that the PIQE program is well attended and participation 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. These strategies should be used consistently in every lesson to support EL students' language acquisition.
2. Provide Constructing Meaning training for instructional aides who work with mainstreamed EL students so they can better support students by implementing these strategies.
3. Provide school administrators with focused professional development designed specifically to improve instructional delivery. Require administrators to provide specific feedback to teachers following walkthroughs.
4. Implement some form of tiered intervention, possibly Response to Intervention (RtI), for struggling students. Make differentiated instruction the first tier used in the regular education classroom, then progress to more intensive interventions if a student fails to respond.
5. Provide teachers with professional development focused on differentiating instructional strategies to target the needs of EL students, students with disabilities, and struggling students. Closely monitor the implementation of these strategies.
6. Continue to support collaboration in PLCs by continuing the early dismissal and collaboration schedule.
7. 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 FCMAT May 2011 Special Education Review report and corresponding action plan.

8. 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 classroom.
9. 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.
10. See also the related recommendations in Standard 3.17.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 2

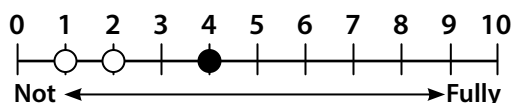
March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 4

May 2015 Rating: 4

Implementation Scale:



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).

Findings

1. Discussion and planning to better align courses between the two comprehensive high schools are ongoing. Both high schools have continued improving their ability to develop their master schedules in a timely manner to benefit students and teachers.
2. Elective offerings are increasing. However, efforts by staff need to remain consistent so that many students as possible get the elective they choose rather than being placed in an alternative elective offering. Credit recovery opportunities continue to improve, though the number of students who need to make up a failed class is not declining.
3. Advanced Placement (AP) participation and course offerings are increasing at both comprehensive high schools, but there is still a significant difference between the two high schools in teaching strategies, AP offerings, and AP exam results. For example, although relatively similar in size, King City High School offers two more AP classes and two more pre-AP classes than Greenfield High School. In 2012-13, the last year data was available, King City High School had 64 more students take AP exams than Greenfield High School. In the same year, 46% of the students taking AP exams at King City High School received a score of 3, 4, or 5, while only 29% at Greenfield High School received these same scores.
4. Alternative education is becoming more organized and a more effective option for students who are at risk of not obtaining a high school diploma.
5. The number of graduates that have met A-G college entrance requirements has declined and remains low compared to the countywide and statewide average. For 2012-13, the statewide average was 44.1%, the countywide average was 37.4%, and the district's average was 21.6%. The district is self-reporting a significant decline in 2013-14, with an average of 13.3% of students meeting A-G college entrance requirements.
6. Although there are sporadic examples of effective teaching practices at both comprehensive high schools, they are more the exception than the norm.

Recommendations for Recovery

The district should:

1. Continue narrowing the gap in programs, practices and results at the two comprehensive high schools. This includes 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, areas such as this should be addressed and evaluated.

2. Identify the best teaching practices at the two comprehensive high schools and begin a systematic review to determine how often they are used in classrooms and lessons. These identified practices should become a primary focus of staff development and points of emphasis for trainings and professional learning programs provided by the curriculum coaches and site and district administrators.
3. Continue to ensure that course offerings at the two comprehensive high schools are similar, and offer courses that prepare more students to qualify for entrance to the California State University or University of California system after graduation.
4. 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.
5. Conduct a periodic survey of students and parents to evaluate the assistance and direction of counseling provided for career and college decisions.

Standard Partially Implemented

February 2010 Initial Rating: 2

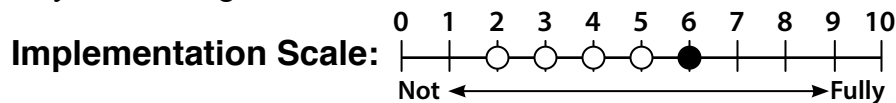
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 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)

Findings

1. Special education is in another transition, with changes in administration, and has shown some regression. The district is working with a part-time consultant and will make decisions later this school year about configuring and implementing the special education improvement plan that is recommended.
2. Alternative education remains stable and continues to provide viable options for students and families who are having difficulties being successful in the comprehensive high schools.
3. The alternative education program was scheduled to undergo a WASC accreditation review in the spring of 2015.
4. The district has improved the alignment of alternative education courses and curricula with those of the comprehensive high schools.

Recommendations for Recovery

The district should:

1. Make the reorganization and reconfiguration of special education a top priority. Ensure that policies, practices and procedures are updated and adhered to, thus ensuring a consistent and positive educational experience for students with special needs.
2. Implement and follow accountability components to ensure that alternative education programs teach all curricula and meet the same educational standards as the courses taught in the comprehensive high schools.
3. Implement the recommendations in the May 2011 special education review done by FCMAT 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

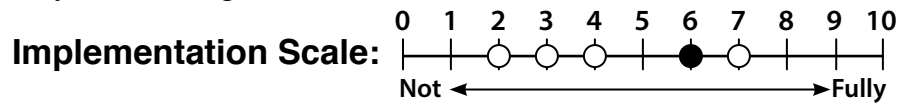
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 6



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)

Findings

1. Regular education staff 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 policies, practices, and procedures for special education need to improve and become more efficient and commonplace.
4. Communication among special education staff is sporadic and inconsistent. A districtwide vision for special education still needs to be established and its implementation started. The district is not monitoring instruction effectively for the use of best instructional practices and expected results for students with active IEPs.

Recommendations for Recovery

The district should:

1. Provide special education assistants with training in instructional strategies to support special needs students when they are in regular education classrooms.
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 to help staff keep certifications updated.
3. Finish implementing the recommendations provided in FCMAT's March 2011 special education review of the district.
4. Develop and establish a clear administrative chain of command that provides accountability, communication and follow-through for special education programs, classes, and students with active IEPs.
5. Continue to keep all board policies related to planning and implementing special education programs and services updated, including identification, screening, referral, assessment, review, and triennial assessment of students with special needs.
6. Consult with special education local plan area (SELPA) program specialists for help when developing policies and procedures.

7. Provide staff development that emphasizes instructional strategies and techniques for teachers who are teaching mainstreamed special education students.
8. 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

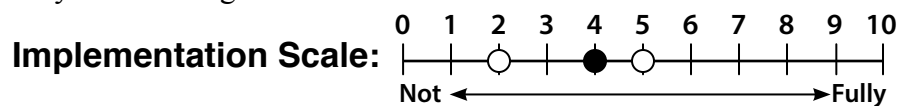
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 4



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.)

Findings

1. The district and schools continue to increase their compliance with state and federal guidelines.
2. Because of another change in special education leadership, progress in improving effectiveness to deliver a quality program has been minimal this school year. The district has a critical need for a districtwide vision for special education and a comprehensive plan for its implementation.
3. The IEP process is still a work in progress and has issues that need to be resolved. Teacher attendance at IEP meetings is low, caseloads for special education staff need to be re-evaluated, and not all IEPs are current.
4. 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. Finalize a comprehensive vision for special education throughout the district and develop a detailed plan for its implementation.
2. Work to attract and retain strong leaders in special education so the district can begin systematically implementing its long-term plans for special education.
3. Continue to monitor and support co-teaching to ensure that students benefit from this model.
4. Hold regular education teachers and school administrators accountable for attendance, input and involvement in the IEP process. As recommended in FCMAT's 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.

5. Provide support to teachers and administrators so that special education students benefit from mainstreaming. Establish trainings for all 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

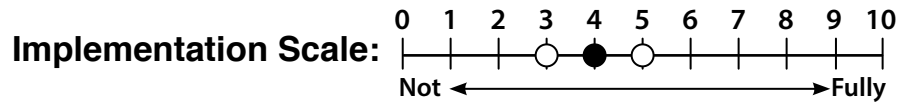
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 4



3.13 Instructional Strategies

Professional Standard

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

Findings

1. Instructional coaches are in place at each comprehensive high school site to support Constructing Meaning and English learner instruction.
2. The district is in its third year of collaboration days. Plans, efforts and expected outcomes are becoming better coordinated between the two comprehensive high schools.
3. The district has another new director of educational services this school year, who is responsible for instructional planning and implementation, and staff development.
4. During and as a result of ongoing collaboration days and staff development efforts, articulation and communication between departments at the two comprehensive high schools is increasing and improving.
5. School administrators and instructional coaches conduct walkthroughs of classrooms. The focus of the walkthroughs is to identify Constructing Meaning strategies, observe posted objectives for the lesson being taught, and see the extent to which students are engaged in learning. Feedback to teachers regarding the classroom walkthroughs has yet to be implemented.

Recommendations for Recovery

The district should:

1. Continue improving communication between the two comprehensive high schools regarding collaboration day expectations, outcomes and plans.
2. Establish comparable instructional leadership and coaching resources and strategies at each of the three high schools.
3. Establish specific goals and measurable outcomes for the instructional leadership positions. Ensure that these positions provide guidance, planning and professional development for all instructional improvement efforts.
4. Ensure that alternative education benefits from the support of instructional leadership.
5. Continue to strengthen and refine school-based and district collaboration plans and calendars. Prioritize and set dates for specific collaboration and staff development efforts and trainings.

6. Monitor classrooms for use of strategies that increase student engagement, and provide timely feedback to teachers regarding what was observed.
7. Visit other school sites or districts with similar demographics that have demonstrated high levels of student engagement, resulting in higher achievement for all students.
8. 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.
9. 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

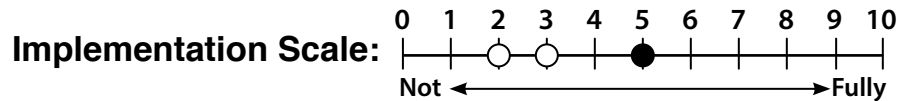
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 5

May 2015 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.

Findings

1. 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 intervention, and after-school and Saturday school academic support. The district recently began implementing Link Crew, a program that provides mentoring for incoming freshmen to help ensure a good start in high school. The district has also targeted 10th grade English learners using Title I SES resources.
2. 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 instructional coaches to help with this. The coach at King City High School is full time, the coach at Greenfield High School is .25 FTE, and there is no coach at Portola-Butler Continuation High School.
3. During classroom observations FCMAT noted that some classrooms had grades posted. In some of those, a majority of the students had a grade of D or F, indicating that they were not succeeding.
4. The district recently added a school psychologist, who is a behavior specialist, to help provide behavioral health services for students.
5. Students would like to have more electives, and specifically a variety of electives, so that placement in open periods or serving as a teacher's assistant are not their only options to fill their schedules.
6. Students and teachers expressed the concern that students who exit EL intervention classes as a result of being redesignated as English proficient have limited options for placement in an appropriate class. Many core content classes are full, and counselors have difficulty finding appropriate classes for these students.
7. Special education teachers are co-teaching at one school, with aide support, to better accommodate mainstreamed special education students. Both special and regular education teachers had largely positive opinions regarding using this method.
8. 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.

Recommendations for Recovery

The district should:

1. Ensure that school administrators review grades assigned by teachers quarterly to assess whether or not all teachers of a given subject are using standard grading practices. If a majority of the students in a class are not being successful, the school administrator should work individually with that teacher, or assign the instructional coach or a colleague to do so, to improve instructional delivery.
2. Focus efforts on alternatives and tiered interventions that accelerate learning, with the goal of getting struggling students back in regular classes and on track for graduation by the start of their sophomore year.
3. Provide teachers with professional development focused on differentiating instructional strategies to target the needs of EL students, students with disabilities, and struggling students. Closely monitor the implementation of these strategies.
4. 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.
5. Consistently provide feedback to teachers regarding classroom walkthrough results and the work done during collaboration time. Feedback should be specific, with suggestions for improving instruction.
6. When fiscal conditions allow, consider adding more electives for students. Ensure that students and teachers have opportunities to provide input on this topic.
7. 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.
8. 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.
9. Ensure that students in ELD and SDAIE classes are receiving instruction appropriate to their language levels and that appropriate strategies are being used.
10. 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

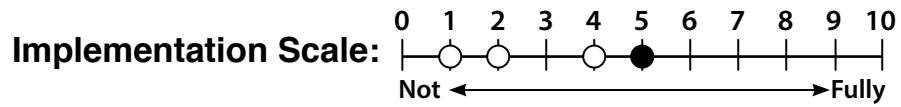
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 5



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.

Findings

1. There is evidence that the district has developed a districtwide EL placement chart to help place EL students in the appropriate 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, CAHSEE, CELDT, and local Scholastic Reading Inventory (SRI) assessment to help determine individual student placement. The district also considers teacher recommendations when placing students.
4. The district has discontinued implementing Aeries Analytics as its data analysis software. Staff report that it is difficult to use and there is no consistency in how it is being used. This restricts their ability to share data in a timely manner and to monitor progress. The district is choosing a different system and hopes to have it fully operational for the 2015-16 school year.
5. There is evidence that teachers and departments use data when available to guide conversations about improving student achievement. The district now has a full-time instructional coach at King City High School and a .25 FTE coach at Greenfield High School to provide teachers with a CELDT level for every English learner enrolled in their classes.
6. The district is addressing the shift to the Common Core State Standards and the new state assessment system. Teachers are increasing opportunities for students to write because it is expected that the new Common Core assessments will require written responses in all content areas.
7. The district continues to provide support for students who need help to pass the CAHSEE or need credit recovery options.

Recommendations for Recovery

The district should:

1. 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. Implement tiered interventions, possibly Response to Intervention (RtI), for struggling students. Use differentiated instruction and accommodations in the regular education classroom as the base tier, and progress to more intensive interventions if a student fails to respond.
3. Ensure that the district and schools agree on the essential standards that every student needs to meet and are not limited to the standards on the CAHSEE.
4. 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.
5. Review and revise pacing calendars to ensure that they align with the essential standards and common assessments.
6. Monitor the implementation and use of pacing calendars and common assessments, and ensure that results are analyzed during scheduled collaboration time.
7. See the related recommendations in Standard 2.4.

Standard Partially Implemented

February 2010 Initial Rating: 2

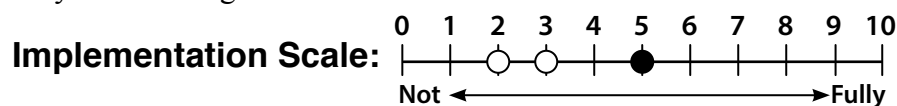
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5

May 2015 Rating: 5



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.

Findings

1. The district English learner advisory committee (DELAC) and the English learners advisory committees (ELACs) at both comprehensive high schools are operational. Greenfield High School's ELAC has voted to allow their school site council to make decisions on their behalf for a second year in a row.
2. The district has placed instructional coaches at two schools. The coaches 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 comprehensive high schools. King City High School has a full-time coach, Greenfield High School has a .25 FTE coach, and Portola-Butler Continuation High School does not have an instructional coach.
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 and 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. During classroom observations, FCMAT found little evidence that these strategies are being implemented. No language objective was posted in most of the classrooms, and only four of the 40 teachers observed by FCMAT were addressing the objective in their instruction.
6. The district does not have a current Title III improvement plan and has not met the Title III Annual Measurable Achievement Objectives (AMAOs) for 11 years. There is a significant achievement gap between EL students and other student groups.
7. The district has enough trained and qualified teachers and staff to assess and support the significant number of EL students and their parents.
8. There was some difference between the instructional strategies used in ELD and 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. During classroom observations, FCMAT

found little evidence 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. If using the LEA plan Goal 2 to meet the Title III improvement plan requirement, include all required components including cost estimates, related expenditures, funding source, timeline, and personnel responsible for each activity.
2. Emphasize gaining proficiency in using language acquisition strategies that give students opportunities to speak frequently using academic language at the level indicated by the CELDT assessment. Ensure that ELD experiences provide rigorous lessons for students in addition to promoting language acquisition.
3. Closely monitor the use of Constructing Meaning and SDAIE strategies in all classrooms in which English learners are enrolled. Review student achievement data and evaluate the effectiveness of these programs.
4. 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 them assess, place, monitor and exit EL students. Provide professional development for administrators and coaches to help them give teachers constructive feedback following classroom walkthroughs.
5. Continue to monitor and support ELD and SDAIE classes to ensure that instruction is appropriate for EL students and their specific language levels. To promote language acquisition, ensure that EL students have many opportunities to practice using academic language.
6. Continue to provide all teachers with the CELDT language levels of all of the EL students in their classes so they can more effectively differentiate instruction to accommodate these students and accelerate their learning.
7. Continue to implement the following three recommendations from the February 2010 and March 2011 comprehensive reviews:
 - Continue to 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.
 - 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.

- Ensure that the student data 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

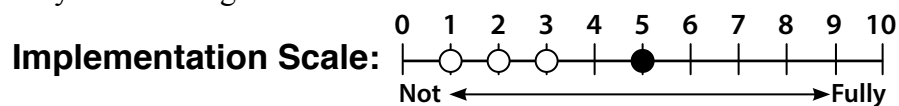
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 5

May 2015 Rating: 5



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.

Findings

1. The district has placed an instructional coach at two schools to support Constructing Meaning implementation, the use of CELDT levels, and related instructional needs of EL students. King City High School has a full time coach, Greenfield High School has a .25 FTE coach, and Portola-Butler Continuation High School has no coaching support.
2. The district provides one full-time counselor at each comprehensive high school. Each counselor serves more than 900 students. Parents, teachers and students would like to have at least one more counselor at each school.
3. Some 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 lost its director of special education this year and has hired a part-time special education consultant to review systems, programs, and practices and to write an improvement plan to focus on staffing, overall program structure and quality, accountability, and compliance.
5. Co-teaching and instructional aide support is in place at Greenfield High School to support special education students who are mainstreamed into regular classes. King City High School is providing aide support for mainstreamed students.
6. Four hundred three students graduated from the district in 2014; 62 of these students completed A-G requirements. The percentage of students completing A-G requirements declined significantly, from 20.7% in 2013 to 15.4% in 2014.

Recommendations for Recovery

The district should:

1. Provide the same level of coaching support at each of the district's schools to better support English language learners and the staff who serve these students.
2. Work to decrease its student-to-counselor ratio to help improve A-G completion rates and graduation rates.
3. Continue to use the expertise available in the district to provide professional development and to help implement training.

4. Work with a specialist in English learner instruction to ensure that its EL program results in academic success for students.
5. 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.
6. 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. Plan for more consistent collaboration time between schools.
7. Work with the special education consultant to identify areas of need in special education. Continue to support changes that will result in an effective program that consistently provides appropriate settings and instruction for special education students.

Standard Partially Implemented

February 2010 Initial Rating: 0

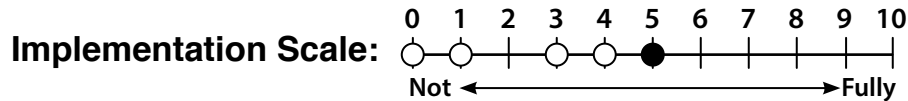
March 2011 Rating: 1

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 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)

Findings

1. The district continues to make progress in 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 its schools' websites continue to improve and provide the community with current and relevant information.
3. School board members continue to demonstrate a strong understanding of the district's needs and a good working knowledge of educational practices and terminology.
4. The district's relationship with its feeder district for King City High School is strengthening and is apparent to many local community members. The relationship with the feeder district for Greenfield High School is still being developed.
5. Instructional materials and technology hardware continue to be updated. Both comprehensive high schools have added new computer labs and faster broadband access.
6. There is significant local knowledge in the communities of the two comprehensive high schools that would be invaluable to the district as it continues to design courses of study and real-world applications.

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 provide department budgets for materials and supplies at each school site.
4. Further promote and increase the 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.

5. Conduct a survey of 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.
6. 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

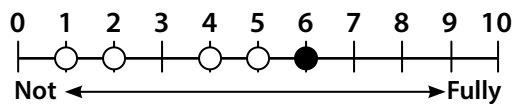
March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6

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.

Findings

1. Teachers continue to work collaboratively to develop and refine benchmark assessments. Teachers and administrators reported continued collaboration between the two comprehensive high schools in mathematics assessments. Mathematics teachers from both comprehensive high schools continue to collaborate on implementing Math 1, and are collaborating on Math 2 for the first time this year. Teachers are working together to develop common benchmarks for this program, and both schools are administering the same benchmarks in all Math 1 and 2 courses. In addition, math teachers are working together to develop smaller quizzes focused on specific skills.

English teachers continue to collaborate with their counterparts at other schools and are working to develop and refine common benchmark assessments and performance tasks to allow students to practice tasks similar to those in the new state assessments.

English teachers and math teachers collaborated on scoring the common assessments and determining next steps based on the results. History social science teachers collaborated on two writing benchmark assessments this year. Science and agriculture science teachers are working together to implement Next Generation Science Standards.

2. Teachers continue to use collaboration time to examine results of assessments and to identify ways to improve teaching practices. Teachers reported collaboration time was being used more effectively this year. They are able to examine student results in more detail and identify whether students are learning specific skills. When students have not mastered specific skills, teachers indicated they are collaborating on how to modify instructional practices to improve student performance in the targeted skills.
3. The district has discontinued implementing Aeries Analytics and is searching for a replacement software program. Some teachers continue to use Aeries Analytics, but others found it too difficult to use. Teachers and administrators reported the lack of a common tool for data analysis has set them back in data analysis, but expressed support for identifying software that will better meet the district's needs.
4. See related findings under Standard 5.3.

Recommendations for Recovery

The district should:

1. Identify data analysis software that will meet the district's needs, and provide all teachers and administrators with professional development on the use of this software.

2. Provide staff with training and coaching in developing and using assessments to influence and shape instruction.
3. Use assessment results to identify students who need additional support, and provide this support.
4. View assessment not as an event but as a system with all the tools and resources needed for continuous improvement in teaching and learning.

Standard Partially Implemented

February 2010 Initial Rating: 2

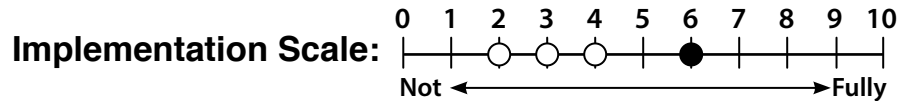
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 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.

Findings

1. The district has discontinued its implementation of Aeries Analytics and is searching for a replacement. At the time of the review, teachers were using different analysis tools. Some continued to use Aeries Analytics, others did calculations by hand, and others used Microsoft Excel. Teachers and administrators reported the lack of a common software for data analysis has slowed data analysis, but expressed support for identifying software that will better meet the district's needs.
2. Data to determine the effectiveness and implementation of Constructing Meaning strategies are not compiled schoolwide or districtwide.
3. See related findings under standards 2.4 and 3.16.

Recommendations for Recovery

The district should:

1. Identify a data analysis tool that will meet the district's needs, and provide all teachers and administrators with professional development on the use of this tool.
2. Ensure 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.
3. Provide focused professional development and ongoing coaching to help teachers learn to analyze data to identify any changes needed in their instruction. This professional development 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 teachers receive a consistent, focused message about how to use assessment results and how the new data analysis tool can help them access and analyze data.
4. Continue developing common assessments and using assessment results to improve instruction.
5. See the related recommendations in standards 2.4 and 3.16.

Standard Partially Implemented

February 2010 Initial Rating: 2

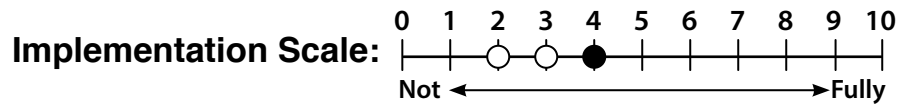
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 4

May 2015 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.

Findings

1. District and school administrators reported an effort to provide additional supports for struggling students. A parent involvement coordinator was added at each comprehensive high school to identify students who need additional support and communicate with parents to ensure the parents and the student understand the options available for intervention and support. The parent involvement coordinators also focus on attendance and are helping schools increase average daily attendance this year.
2. Both comprehensive high schools continue to provide after-school tutoring in core subjects and credit recovery options. Credit recovery during Saturday school is offered for students who do not have time for credit recovery during the school day. In-school and after-school CAHSEE preparation sessions are also provided; the after-school sessions are open to anyone who wishes to attend, but staff reported these sessions are not well attended. Title I Supplemental Educational Services (SES) resources are used to target 10th grade English learners. Staff also reported 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, teachers reported that discipline problems were hindering efforts to support struggling students. During fieldwork for both the fifth and sixth comprehensive reviews, administrators and teachers reported an improved school climate and decreased discipline problems. However, staff indicated that discipline issues continue to pose problems. The district has implemented in-school suspensions and is working to ensure that students who receive in-school suspension use this time to focus on schoolwork.
4. The district uses CAHSEE, CELDT, and local Scholastic Reading Inventory (SRI) assessment results, as well as teacher recommendations and course grades, to help determine which classes to place students in.
5. Coaching is available at the comprehensive high schools 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. A full-time instructional coach is provided at King City High School and a .25 FTE coach is provided at Greenfield High School. Portola-Butler Continuation High School does not have a coach to assist teachers. Coaches help teachers analyze data and also help by modeling lessons and providing feedback after

observing teachers implementing specific strategies. Teachers report the coaching is helpful.

6. Teachers report they need additional teaching strategies for struggling learners. They indicated that although they think Constructing Meaning strategies are helpful, they need additional strategies to help students who are not succeeding. Teachers reported that many current intervention strategies are optional and do not include differentiated instruction. For example, students can go to after-school tutoring or come and see the teacher at lunch or before school. Teachers expressed a desire for more interventions that can be implemented in the regular classroom before the student has failed.
7. District and school administrators reported continued focus on English language development and reclassification of English learners who have achieved proficiency in English. Staff reported students continue to be redesignated as English proficient and the redesignation rate is higher than it was several years ago.
8. Mathematics teachers from the comprehensive high schools are collaborating on implementing the integrated mathematics classes. Teachers developed common benchmark assessments and met to review the results and plan next steps. In addition, teachers from both comprehensive high schools are visiting each other's classrooms to learn with and from other teachers. Teachers expressed support for these collaborations.
9. 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. Administrators and teachers also indicated they felt there was a need to increase expectations; they felt too many students had low expectations and did not engage fully in school as a result.
10. Administrators, teachers and board members expressed support for more advanced classes. The district has set a goal of increasing the number of Advanced Placement classes it offers.

Recommendations for Recovery

The district should:

1. Provide ongoing coaching and professional development on the effective use of disaggregated data to ensure changes in teaching practice are implemented and refined over time. Coaching should focus on effective classroom practices to meet the needs of all students, including differentiated instruction for struggling students.
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, then hold them accountable for analyzing data, modifying classroom practices and providing interventions for struggling students based on data.
4. Continue to work on raising expectations for all students.
5. See the related recommendations in standards 2.4 and 3.16.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 1

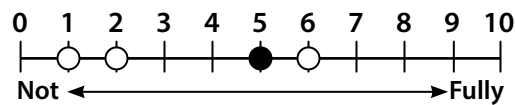
March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 Rating: 5

Implementation Scale:



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.

Findings

1. The district has updated its LEA plan to include current student achievement data and improvement goals for 2014-15.
2. Single plan for student achievement (SPSA) updates were approved before the start of this school year. Greenfield High School's SPSA included all required components; Portola-Butler Continuation High School's plan was missing some information under estimated cost and funding source; and King City High School's plan was approved at the school and district level but was missing information on school goals, metrics, and cost or funding source and had not been updated at the time of FCMAT's fieldwork in February 2015.
3. School site council members have been involved in reviewing plans and making recommendations; however, they reported that they do not have the opportunity to provide input on the budget and expenditures prior to approval.
4. The district's professional development plan has been updated to include training that supports full implementation of school and district improvement plans.
5. School and district administrators are monitoring the implementation of most improvement plans (LEA plan, SPSAs, and WASC).
6. All administrators and teachers have participated in district-provided training on Constructing Meaning (a research-based program designed for secondary English learners). Administrators, instructional coaches, and the director of educational services attended a professional learning community (PLC) training presented by the Dufours, leading experts in this field, before the start of this school year.
7. School administrators regularly walk through classrooms to observe implementation of Constructing Meaning but are not providing any direct feedback to teachers.

Recommendations for Recovery

The district should:

1. Continue to ensure that the LCAP, LEA plan and the SPSAs are developed using a collaborative process that includes administrators, teachers, parents, other staff as appropriate, students, and community members. Ensure that plans are finalized, and that

they contain all required information before being approved at the school and district level.

2. 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.
3. Ensure that all SPSAs are complete prior to school site council and board approval. Also ensure that school site council members have adequate time to provide input and suggest revisions before final approval.
4. Continue to align the districtwide professional development plan with the LCAP, LEA plan, SPSAs, and WASC review. Include the individuals responsible, and prioritize activities.
5. Analyze plans each year to determine whether the activities included in the plans and the allocation of resources are helping the district reach its student achievement goals.
6. Continue to use the District and School Liaison Team (DSLTL) to help monitor district plans. The team should include district and school administrators, teachers, classified staff and other staff as appropriate. This team should meet at least once every quarter.
7. Develop a process for administrators to provide direct feedback to teachers about what they observe during walkthroughs. Feedback should focus on improving instructional delivery.

Standard Partially Implemented

February 2010 Initial Rating: 1

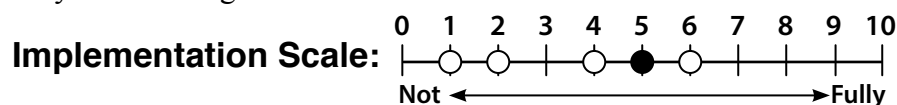
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 Rating: 5



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.

Findings

1. The district continues to make progress in monitoring the implementation of programs. The district and school 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 for monitoring program implementation have been developed and are being used during these walkthroughs. No direct feedback is being provided to teachers following the walkthroughs.
3. Collaboration time is structured and monitored by 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 at Portola-Butler Continuation High School.
5. FCMAT's classroom observations and interviews with teachers revealed that there is wide variation in the depth of commitment to the instructional strategies that will accelerate learning for English learners and the lowest-performing students. There is evidence that teachers are not implementing these strategies in their classrooms consistently.
6. The director of educational services conducts two hours of walkthroughs per month with each school administrator. The focus for this year is on math instructional practices and ensuring implementation of Constructing Meaning.
7. The district has an expectation that all school administrators will conduct walkthroughs at least 55 minutes per day to monitor programs. Some administrators are struggling to meet this requirement.

Recommendations for Recovery

The district should:

1. Continue to use monthly administrator meetings as a forum for principals to have open discussion, identify challenges, share ideas, and formulate next steps to improve the delivery of program content and the quality of instruction.

2. Provide school administrators with professional development that focuses on improving the quality of instructional practices. If an administrator observes ineffective teaching in a classroom, they should be able to provide individual feedback with specific suggestions for improvement immediately following the observation. The primary role of every administrator is to be an instructional leader.
3. Consistently provide specific feedback to teachers regarding classroom walkthrough results and the work done during collaboration time. Feedback does not always need to be individual; it can be a summary of the results of a week or two of classroom walkthroughs that is shared with everyone. For example, the principal might indicate a specific strategy they are looking for over the next two weeks. The principal could provide feedback to teachers as a group regarding the percentage of classrooms in which he or she saw the particular strategy and share examples of effective practices observed.

Continue to work toward full implementation of the following recommendations provided in the first comprehensive review report in February 2010:

4. 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.
5. 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

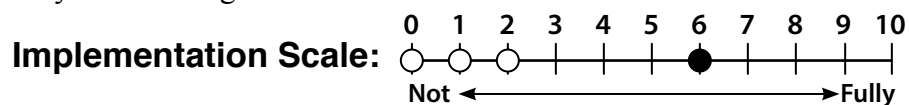
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

June 2014 Rating: 6

May 2015 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.

Findings

1. With another change in special education leadership, progress in this standard has been minimal, and the department is once again in transition.
2. Teachers throughout the district still have a limited understanding of the policies and procedures that ensure the correct application of special education rules and regulations.
3. The district continues to improve and increase communication with parents and community members in both English and Spanish. There are continuing efforts to provide written communications from the district and the schools, including rules and policies in Spanish on the district's and schools' websites.
4. The board reviews and updates policies that affect special education.

Recommendations for Recovery

The district should:

1. Finalize and implement a comprehensive improvement plan for the special education program and its leadership position.
2. Use the procedural reorganization recommendations provided by the consultant currently directing special education.
3. Continue to review and revise board policies and administrative regulations.
4. Continue to follow the recommendations in FCMAT's May 2011 special education review to organize and ensure that all special education master files are complete, are securely housed at the district office, and are accessible and trackable when temporarily removed from the district office.
5. Provide policies, communications and other information in Spanish on its website.

Standard Partially Implemented

February 2010 Initial Rating: 2

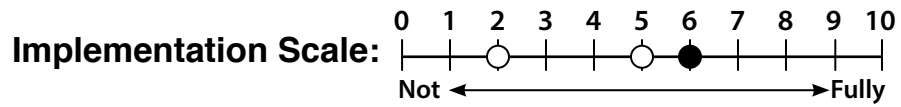
March 2011 Rating: 2

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 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.

Findings

1. The district has established a professional development plan for the 2014-15 school year and a schedule for professional development activities, consistent with the professional development goals expressed in the LEA plan. Teachers reported an increase in professional development this year and indicated this professional development is useful. The district continues to focus on implementing Constructing Meaning strategies, integrated mathematics, English language development, Common Core State Standards, and Next Generation Science Standards. In addition, the district provided professional development on professional learning communities (PLCs) to PLC leads in December 2014; and teachers indicated this professional development along with support from the director of educational services and the consultant hired to assist with PLCs are helping make the PLC time more effective.
2. The district is implementing its plans for professional development and is making progress. Teachers are receiving training on implementing Common Core. The mathematics teachers received professional development and collaborative planning time to implement Math 1 and 2, and teachers from both comprehensive high schools are working together to implement that curriculum. Math teachers are focusing on learning the new mathematics curriculum, including incorporating more language activities in mathematics classes, asking students to explain their approaches to solving problems and their rationale for the selected approach. English teachers continue to work together on calibrating and scoring benchmark assessments and performance tasks. Science teachers are working on the Next Generation Science Standards, including teaching practices, unit planning, science benchmarks and pacing guides. The district sent a team with representatives from both comprehensive high schools to a science, technology, engineering and mathematics (STEM) conference to help those who teach these subjects envision how changes could be made to increase rigor in the curriculum. The district also provided training in English language development.
3. The district continues to provide training and coaches to help teachers meet the needs of English learners and implement Constructing Meaning strategies. New teachers were trained in Constructing Meaning. King City High School has a full-time coach and Greenfield High School has a .25 FTE coach. Portola-Butler Continuation High School does not have a coach to help teachers. Some teachers reported having the coach model lessons; others reported having the coach observe them using a new strategy and provide feedback. Some teachers reported they see English learners talking with more confidence and see former English learners moving into more advanced classes like chemistry. FCMAT observed Constructing Meaning strategies in some of the classrooms visited but

not in others. In interviews, administrators and teachers indicated that implementation of Constructing Meaning strategies was not consistent across classrooms.

4. School and district administrators indicated teachers are held accountable for implementing the strategies covered in professional development. School site administrators are conducting classroom walkthroughs, which include looking for implementation of Constructing Meaning strategies. However, administrators do not provide feedback to teachers on their walkthroughs. Coaches are also monitoring implementation of strategies and do provide ongoing feedback to teachers. The district is not compiling schoolwide or districtwide data on the effectiveness and implementation of Constructing Meaning strategies.

Recommendations for Recovery

The district should:

1. Continue to build a core team that has 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

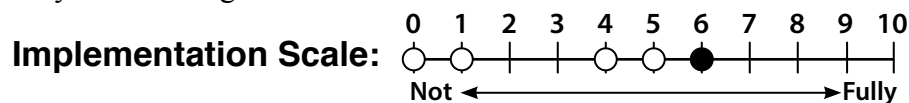
March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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.

Findings

1. Teachers and administrators indicated weekly collaborations continue to be used for a variety of purposes, including intradepartmental collaboration on activities such as developing common benchmark assessments, analyzing data, developing curriculum, and sharing effective instructional strategies. Coaches help teachers focus on improving instructional strategies. However, although the two comprehensive high schools are approximately the same size, King City High School has a full-time coach but Greenfield High School has only a .25 FTE coach because of difficulties filling the full-time position. Coaching is not available to Portola-Butler Continuation High School.
2. Teachers reported their collaboration time is being used effectively this year and they are successfully using the time to analyze teaching practices and identify improvements.
3. Teachers and administrators indicated that administrators structure collaboration time and are providing more flexibility in the use of that time compared to last year. Teachers reported the increased flexibility was helpful. In addition, this was the first review in which teachers indicated that they are able to use collaboration time to reflect on whether students are learning specific skills and, if not, how teaching strategies can be changed to improve outcomes.
4. Teachers and administrators reported the change in data analysis software has slowed data analysis efforts because teachers are using a variety of tools to analyze data, which is more time-consuming and less comprehensive than a single districtwide data analysis tool would be.
5. Administrators and teachers reported increased collaboration between the two comprehensive high schools. The mathematics teachers are collaborating on the countywide effort to implement the integrated mathematics program. English teachers also reported collaboration between the schools as they work to prepare, implement and score performance-based assessment tasks. Science and agricultural science teachers are collaborating on preparing for implementation of the Next Generation Science Standards.
6. Teachers and administrators indicated reclassifying English learners remains a priority. Although teachers felt Constructing Meaning strategies were helpful, they also expressed a desire to have additional strategies to help English learners achieve.

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. Provide both comprehensive high schools with an equivalent amount of coaching support, or provide coaching support at each school based on student data. If the district can only find a total of 1.25 FTE coaching staff, distribute that time equitably between the two comprehensive high schools, and allocate some coaching time to Portola-Butler Continuation High School based on students' needs.
3. 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.
4. 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 needing improvement, and change instructional strategies to better meet students' needs.

Standard Partially Implemented

February 2010 Initial Rating: 1

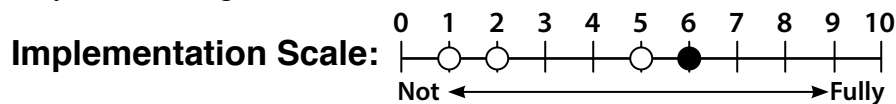
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 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.

Findings

1. The LEA plan approved by the state administrator on June 18, 2014 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. In addition, the LCAP was approved in June 2014 and includes goals and outcomes as well as professional development to support them.
2. School site plans are generally aligned with district plans. The Greenfield Single Plan for Student Achievement (SPSA) was approved before the start of the school year and included all required components, including estimated costs and funding sources. Portola-Butler Continuation High School's SPSA was missing some information under estimated cost and funding sources. The King City High School SPSA was approved in June 2014 without information on goals, metrics, costs and funding sources. The plan had not been revised to add this missing information as of FCMAT's February 2015 fieldwork.

Professional development activities in the 2014-15 school year focus on helping the mathematics teachers implement Math 1 and 2; supporting the implementation of the Common Core State Standards and preparing students for performance-based assessments; continuing to implement Constructing Meaning strategies and the English language development curriculum; and preparing for the implementation of Next Generation Science Standards.

3. The district developed and distributed a professional development calendar for the 2014-15 school year that includes dates, topics and intended participants for planned professional development activities.
4. In addition to planned professional development sessions, the district's professional development plan includes funding for coaches to help teachers implement the strategies learned. Teachers reported the coaches were helping them improve by modeling lessons, providing feedback, and helping 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 State Standards and assessments.
2. Continue to develop and support professional development plans, budgets 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 improving student achievement results, revise the LEA plan to include more specific information about the professional development that will be provided.

Standard Partially Implemented

February 2010 Initial Rating: 2

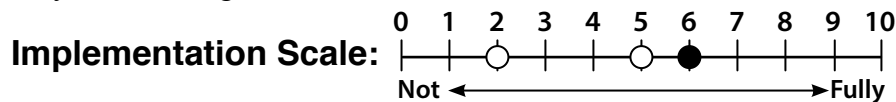
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 5

June 2014 Rating: 6

May 2015 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 Longitudinal Pupil Achievement Data System (CALPADS) and the Online Public Update for Schools (OPUS) necessary to comply with No Child Left Behind reporting requirements. (EC 60900(e))

Findings

1. The district uses Aeries as its student information system. Data from Aeries is extracted and uploaded to CALPADS. Aeries is updated at the school sites, where specific staff are responsible for specific areas. Registrars are responsible for student grades and transcripts; student services technicians enroll new students and update student demographic information; assistant principals and in-house suspension/campus monitors update discipline data; and school office assistants review and monitor attendance information.
2. The district submitted and certified all CALPADS submissions during the 2013-14 school year, including Fall 1, Fall 2, Spring and End of Year 1-4. The 2014-15 Fall 1 data was first certified on November 25, 2014, prior to the reporting deadline. It was subsequently decertified and changes were made during the Fall 1 amendment window to improve data quality. Fall 1 was recertified prior to the final certification deadline. The Fall 2 submission was also certified by the initial deadline and decertified during the amendment window. At the time of FCMAT's review, staff indicated Fall 2 would be certified by the deadline. School administrators reported they continue to review and sign CALPADS reports before the district certifies the data. Staff reported the district consistently communicates with the schools regarding the importance of submitting accurate and complete data to the state.

Recommendations for Recovery

The district should:

1. Continue the work of collecting, maintaining and submitting high-quality CALPADS and OPUS data, including conducting data audits and making efforts to ensure that employees coding information in the student information system understand and uniformly use the correct codes.
2. Continue to submit data to CALPADS, work with school staff and/or the human resources department to resolve any problems, and certify the data by the CALPADS submission deadlines.

Standard Fully Implemented

February 2010 Initial Rating: 6

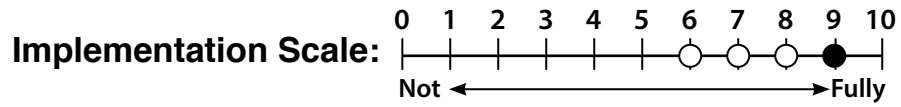
March 2011 Rating: 7

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9

May 2015 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 Control Accountability Plan, 2014 - 2017
2. Local Education Agency (LEA) Plan, June 2014
3. Greenfield High School Single Plan for Student Achievement
4. King City High School Single Plan for Student Achievement
5. Portola-Butler Continuation High School Single Plan for Student Achievement
6. District and school CST Results, 2012-13
7. District and school CAHSEE Results, 2013-14
8. CELDT report, 2013-14
9. Consolidated Programs Application, 2014-15
10. Title III Accountability Reports, 2013-14
11. Professional Development Plan, 2014-2015
12. Schedule of evaluations for teachers and school administrators, 2014-15
13. Bargaining unit member evaluation form
14. Pre-Observation conference form
15. Administrative evaluation form
16. Evaluation Procedures
17. Board resolution for sufficiency of textbooks, 2014-15
18. Textbook inventory, 2014-15
19. District technology plan, 2013-16
20. Local service plan for special education

21. Sample individualized education programs (IEPs)
22. Classroom observation tools
23. School site council membership list for both Greenfield and King City high schools
24. School site council schedule of meetings, agendas, and minutes, 2014-15
25. School site council training dates and training content, 2013-14 and 2014-15
26. Current vision, mission, and goal statements, 2014-15
27. Benchmark assessments, 2014-15
28. Master schedules for each school
29. Board policies
30. Collaboration Schedule 2014 - Revised
31. Fall 1 CALPADS Status
32. Fall 2 CALPADS Status
33. How Information is updated in Aeries 2014-15

Appendix B

Positions and Groups Interviewed

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

1. State administrator
2. Chief business official
3. Director of educational services
4. Principal, Greenfield High School
5. Assistant principal, Greenfield High School
6. Principal, King City High School
7. Assistant principal, King City High School/Interim principal, Portola-Butler Continuation High School
8. Special education consultant
9. Counselors
10. Director of technology
11. Parent involvement coordinators
12. English language development (ELD) liaisons
13. Teachers – representative group from each site
14. Special education instructional assistants
15. Board members
16. Parents – representative group from each site
17. Students – representative group from each site

Table of Pupil Achievement Ratings

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
1.1	LEGAL STANDARD – PLANNING PROCESSES Categorical and compensatory program funds supplement and do not supplant services and materials to be provided by the LEA. (20 USC 6321)	0	1	2	4	6	6
1.3	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA's vision, mission, values, and priorities focus on the achievement and needs of all students with the goals of closing the achievement gap and helping all students meet their full potential.	1	1	1	3	4	4
1.4	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA's policies, culture and practices reflect a commitment to implementing systemic reform, innovative leadership, and high expectations to improve student achievement and learning.	1	2	3	6	5	5
1.5	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA has fiscal policies and a fiscal resource allocation plan that are aligned with measurable student achievement outcomes and instructional goals including, but not limited to, the Essential Program Components. (Revised DAIT)	0	1	3	4	7	7

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
1.6	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA has policies to fully implement the State Board of Education-adopted Essential Program Components for Instructional Success. These include implementation of instructional materials, intervention programs, aligned assessments, appropriate use of pacing and instructional time, and alignment of categorical programs and instructional support.	1	2	4	5	7	7
1.8	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA provides and supports the use of information systems and technology to manage student data, and provides professional development to site staff on effectively analyzing and applying data to improve student learning and achievement. (DAIT)	2	2	3	6	6	6
1.9	PROFESSIONAL STANDARD – PLANNING PROCESSES The LEA holds teachers, site administrators, and LEA personnel accountable for student achievement through evaluations and professional development.	0	1	2	4	7	6
2.1	LEGAL STANDARD – CURRICULUM The LEA provides and fully implements SBE-adopted and standards-based (or aligned for secondary) instructional textbooks and materials for all students, including intervention in reading/ language arts and mathematics, and support for students failing to demonstrate proficiency in history, social studies, and science. (EC 60119, DAIT)	1	2	3	5	8	8

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
2.3	PROFESSIONAL STANDARD – CURRICULUM The LEA has planned, adopted and implemented an academic program based on California content standards, frameworks, and SBE-adopted/aligned materials, and articulated it to curriculum, instruction, and assessments in the LEA plan. (DAIT)	1	1	3	6	7	6
2.4	PROFESSIONAL STANDARD – CURRICULUM The LEA has developed and implemented common assessments to assess strengths and weaknesses of the instructional program to guide curriculum development.	2	2	3	4	6	6
2.5	PROFESSIONAL STANDARD – CURRICULUM The LEA has adopted a plan for integrating technology into curriculum and instruction at all grade levels to help students meet or exceed state standards and local goals.	1	1	3	3	5	5
3.1	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides equal access to educational opportunities to all students regardless of race, gender, socioeconomic standing, and other factors. The LEA's policies, practices, and staff demonstrate a commitment to equally serving the needs and interests of all students, parents, and family members. (EC 51007)	1	2	2	4	4	4

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
3.6	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides students with the necessary courses to meet the high school graduation requirements. (EC 51225.3) The LEA provides access and support for all students to complete UC and CSU required courses (A-G requirement).	2	3	4	5	6	6
3.7	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA provides an alternative means for students to complete the prescribed course of study required for high school graduation. (EC 51225.3)	2	3	4	6	7	6
3.10	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA has adopted systematic procedures for identification, screening, referral, assessment, planning, implementation, review, and triennial assessment of students with special needs. (EC 56301)	2	2	4	4	5	4
3.12	LEGAL STANDARD – INSTRUCTIONAL STRATEGIES Programs for special education students meet the least restrictive environment provision of the law and the quality criteria and goals set forth by the California Department of Education and the Individuals with Disabilities Education Act. (EC 56000, EC 56040.1, 20 USC Sec. 1400 et. seq.)	3	3	3	4	5	4
3.13	PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES Students are engaged in learning, and they are able to demonstrate and apply their knowledge and skills.	2	2	2	3	5	5

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
3.15	PROFESSIONAL STANDARD – INSTRUCTIONAL STRATEGIES The LEA optimizes opportunities for all students, including underperforming students, students with disabilities, and English language learners, to access appropriate instruction and standards-based curriculum. (DAIT)	1	2	2	4	5	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	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	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	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	6

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 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	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
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	5
4.8	PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY Principals and teachers in underperforming schools and/ or in schools under mandated improvement programs are provided special training and support by the LEA. Improvement plans are monitored.	1	1	2	4	6	5

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
4.10	PROFESSIONAL STANDARD – ASSESSMENT AND ACCOUNTABILITY The LEA and school site administration monitor fidelity of program implementation in the delivery of content and instructional strategies.	0	1	2	6	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	6
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	6
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	6

Pupil Achievement Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
5.5	PROFESSIONAL STANDARD – PROFESSIONAL DEVELOPMENT The LEA plan includes budgeted coherent professional development activities that reflect research-based strategies for improved student achievement and a focus on standards-based content knowledge.	2	2	2	5	6	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	9
Collective Average Rating		1.37	1.87	2.87	4.50	5.78	5.63

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)

Findings

1. 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 and annual notifications provided to all employees. Staff indicated that they received the code of ethics with the employee handbook this year, and were required to sign an acknowledgement indicating they received a copy and agree to abide by the terms of the policy. Conversations about ethics, standards and professionalism are reportedly occurring in cabinet and administrative council meetings. In addition, administrators indicated that information is shared with staff; for example, business office staff meeting agendas and the state administrator's monthly blog periodically contain information regarding fraud and how it is to be reported. Ethics training is also provided to staff online via the Keenan SafeSchools Training modules, and as of February 2015, 55 individuals had completed the training in 2014-15.

During this review period, staff interviews revealed continued improvement in employee attitudes regarding the district and administration. Administrators consistently reported attending administrative meetings to keep apprised of district events and issues, and the state administrator continues to provide the community with information about the district. As with any organization, improving the ethical culture of the district takes time, considerable effort, a consistent message, and visible consequences.

2. 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 Policy (BP) 4119.21/ 4219.21/4319.21, Professional Standards, was 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. Both exhibits are included in the August 2014 employee handbook, and a copy was provided with the August 27, 2014 annual notifications to certificated and classified employees.
3. 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 may deter employees from acting in an unethical or illegal manner.

The district continues to use WeTip, Inc., a separate entity that provides for anonymous reporting of criminal and/or questionable activity. WeTip posters are displayed on district campuses, flyers are available at school administrative offices, and information

is prominently displayed on the district website. The flyers and state administrator's blog include three options for reporting: the WeTip website address, an internal hotline telephone number, and the district's mailing address. Most employees interviewed were aware of the WeTip hotline and what should 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, there is 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.

4. There are three factors that increase the probability of fraud and/or the misuse of physical or cash assets: 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). 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 2007-08 through 2014-15 audited financial statements identified various potential opportunities for fraud. Some of the findings were 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.

5. 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 staff reported that the district is now current with policy updates. District administrators reported that they continue to receive copies of policies that concern their departments or area of expertise, recommend changes to reflect district practice, and see those changes incorporated in the policies presented to the board.
6. The district is required to file California Fair Political Practices Commission's statement of economic interests (Form 700) at various times, coinciding with events in the district. Usually 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 after a newly adopted or amended conflict of interest code takes effect. The following events warranted the filing

of Form 700 statements during this review period: annual filings for 2013, due April 1, 2014; departure of the assistant superintendent and hire of the director of educational services; departure of the director of alternative education; hire of the director of MOTF; and departure of a site principal and vice principal and hiring new employees for those positions. 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 Bylaw 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 Exhibit 9270, Board Bylaws, 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

A comparison of Form 700 statements provided by the district with the list of designated positions shows the following:

- For the 2013 annual statements with a filing deadline of April 1, 2014:
 - The state administrator and five board members completed the annual form prior to the deadline.
 - The CBO and assistant superintendent completed the annual form after the deadline.
 - Forms were not provided for the remaining designated positions.
- For those who assumed or left office during this review period (2014):
 - Forms were not provided for designated individuals who assumed or left office.

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.

7. In the district's audited financial statements for the fiscal years ending June 30, 2009, through 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. As discussed in Standard 10.4, the June 30, 2014 audit report indicates that the district has implemented the finding regarding its ability to continue as a going concern and has continued to reduce audit findings.

Recommendations for Recovery

The district should:

1. Continue to 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. Continued to include board policies and exhibits regarding ethics in the annual notifications to employees and the employee handbooks, 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 and/or a board policy for acting on information reported, including the following: 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. Ensure that statements of economic interest are filed on time for all designated positions as specified in Board Bylaw 9270, including when those individuals assume or leave office.
7. Form an 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

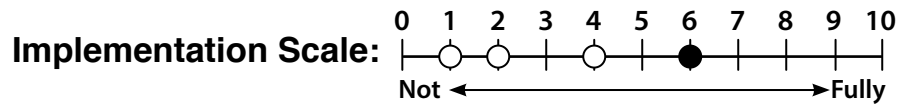
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 2

June 2014 Rating: 4

May 2015 Rating: 6



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)

Findings

1. The district's organizational chart dated December 15, 2014 identifies all management and district support staff positions, their reporting structure, and lines of reporting and support. Staff members indicated that they understood who their supervisor was, and their understanding agreed with the organizational chart. Two boxes on the organizational chart include both a director position and a support position of secretary. However, each position should be displayed in its own box so that the reporting lines are clear. For example, the district secretary should be located in a separate box under the director of educational services, with a line between to indicate the reporting relationship.
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. During this review period, the district filled the payroll/benefits technician and business technician positions, each with a full-time employee, and moved the maintenance, operations, transportation and facilities (MOTF) technician position back to the MOTF department full time.

Having two full-time equivalent (FTE) support positions in the business office has provided the chief business official (CBO) an opportunity to train staff and to oversee more of the day-to-day operational tasks rather than complete them. This has resulted in more segregation of duties. Audit reports from 2007-08 through 2011-12 included the inadequate segregation of duties as a finding; however, the audited financial statements for 2012-13 and 2013-14 did not contain a finding in this area.

3. During the second comprehensive review, district staff members indicated that there had been some irregularities in associated student body (ASB) activities. In response to those concerns, the prior state administrator removed ASB functions from the schools and transferred them to the district office. Many of the duties related to ASB funds were transferred back to the schools effective July 1, 2013, with the district office providing ASB training and oversight to help ensure internal controls. This issue is discussed in further detail in Standards 11.1 and 11.3.

Recommendations for Recovery

The district should:

1. Ensure that its organizational chart includes separate boxes and related reporting lines for each position.

2. Continue to provide business office staff with intensive training to ensure they understand their roles and responsibilities. This training should be provided by current staff when possible, and by county office and other professionals as needed.
3. Continue to provide training to school personnel, advisors and administrators who have responsibility for ASB funds.

Standard Partially Implemented

February 2010 Initial Rating: 3

March 2011 Rating: 4

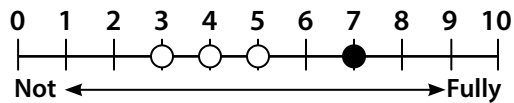
March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 7

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.

Findings

1. Communication between the business department and the school sites and other district departments continues to be timely, and staff continued to report that a good working relationship exists between the parties. However, school administrators, department managers and staff responsible for budget and purchasing functions continue to 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, CBO, director of education services, senior director of human resources, 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, with one meeting focusing on general matters and the next meeting focusing on educational services matters. Members include the executive cabinet, department managers as needed, school principals, and vice principals.

3. With the exception of July 2014, the state administrator has continued to post to his blog monthly during this review period, 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.

5. The 2013-14 fiscal year audit was conducted by Christy White Associates and included six audit findings, two of which were classified as material weaknesses. Of the 10 identified in the 2012-13 audit, five had been implemented, one partially implemented and four not implemented. The district has continued to significantly decrease its audit findings over the last three years; however, three of the four identified as not implemented in 2013-14 have remained for the last three years.

Interviews with staff revealed some confusion regarding whether the audit findings had been shared with them. Some staff thought the findings had been shared, some were unsure, and some stated that they had not been shared. The 2013-14 audit was scheduled to be presented at the January 20, 2015 board meeting. It is a best practice to share annual audit findings with applicable staff members as soon as the audit is received to help ensure that procedures are corrected and staff are held accountable for implementation.

6. The state administrator prepares Friday updates, which are provided to the executive cabinet and board members. These provide detailed information on open and closed session board agenda items, events within the district, and the bulletins from both comprehensive high schools. They are organized to include information from the state administrator and business services, human resources and curriculum departments, and a list of event dates.
7. Schools and departments reported that they have online access to the district's Escape financial software system and can review account line budgets and print financial reports; however, some school staff need additional training to run reports and view categorical budgets. If a budget transfer is needed, in most cases school and department personnel call or email the business office to request one. Although the Escape system has the ability to allow users to prepare budget transfers and then have them electronically approved by the CBO for posting, this has only been activated for a few users. Providing this online capability to all school and department managers and training staff in its use would help provide uniformity and better internal controls.
8. The business department lacks desk manuals with step-by-step procedures for job duties; however, the CBO and business office staff reported that these manuals are being developed. 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. Continue to provide school and department staff with ongoing verbal and written training in 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 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 it is easier to locate and access.
5. Share annual audit findings with school and department staff each year after the audit is completed. Implement processes and procedures to correct each finding, and hold staff accountable for following procedures.
6. Continue publishing Friday updates.
7. Continue to provide all school and department managers with online access to Escape so they may review their budgets, run financial reports and propose budget transfers.
8. Develop a business office procedures manual and 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

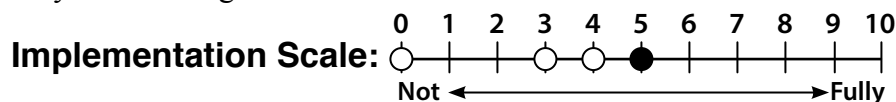
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 4

May 2015 Rating: 5



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.

Findings

1. Education Code Section 17604 requires that the governing board or state administrator approve or ratify all contracts, which includes purchase orders. Board meeting agendas did not previously include lists of the purchase orders; however, the district began including them in the board's monthly meetings beginning on May 13, 2014. As indicated in the previous review, starting with the September 12, 2013 board meeting, warrant reports were presented for approval. FCMAT's review of the board agenda packets also revealed that contracts were included on agendas for approval.
2. An Escape fund balance summary report and a cash flow summary report for each fund were included as information items on the board agenda every month, except in months that include a state-required budget report. FCMAT's review of the district's board packets also revealed that cash flow reports were omitted entirely at the June 11, 2014 meeting and only included the general fund at the August 14, 2014 meeting. Monthly cash flow reports continue to include actuals to date, but do not include projections for the remaining months of the fiscal year.
3. At each state-required budget reporting period, with the exception of the 2014-15 adoption budget presented in June 2014, the CBO provides the board with a budget presentation that includes a narrative executive summary and cash flow reports for the general fund. The cash flow reports presented with the interim budget reports include actuals and projections for the entire fiscal year. Information in the executive summaries varied from report to report. Some of the summaries included assumptions for multiple years and others focused mainly on current year assumptions with limited discussion of multiyear assumptions regarding Local Control Funding Formula (LCFF) gap funding percentages. Some reports included lottery revenue per average daily attendance (ADA) estimates, statutory benefit rates, and discussion of the multiyear recovery plan as well as PowerPoint presentations. The district's latest budget presentation was for the 2014-15 first interim report and included several charts associated with LCFF. However, the board is not consistently receiving information regarding all assumptions used in the multiyear financial projections; year-to-year budget trends in multiple areas; charts and graphs portraying those 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 March 19, 2014, the CBO provided information regarding budgets, how to read them, and the Local Control Accountability Plan (LCAP). All board members attended the meeting.

5. Board members indicated that they feel confident about the information provided regarding the district's finances and have benefited from continued training regarding the district's budget. Board meeting minutes indicate board members are asking questions regarding budget issues.
6. The district continues to develop and/or update several board policies and administrative regulations, including those regarding business and non-instructional operations. Draft policies and regulations continue to be provided to the appropriate administrator or manager for review before being included on the board agenda.

Recommendations for Recovery

The district should:

1. Continue to ensure that each regular board meeting agenda includes the approval of purchase orders, warrants 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 of 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 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. Continue to ensure that the board takes an active role in understanding the district's financial position.
6. 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

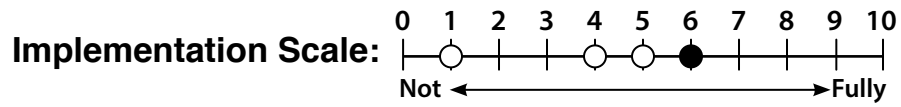
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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.

Findings

1. The district has changed the business department's staffing structure five times in the last five years. The organizational chart dated December 30, 2014 includes 3.0 full-time equivalent (FTE) business department positions: a CBO, a payroll/benefits technician, and a business technician.
2. The district transitioned to the countywide Escape financial software system during the previous review period, and staff members continue to attend training sessions provided by the county office as well as user group meetings.
3. Although the district does not have a formal professional development plan for its business department positions, it has been conducting monthly business office staff meetings. Because both of the staff positions in the business office are new to the district and one is also new to school business, the CBO has included training in the monthly meetings on subjects such as customer service, account coding, acronyms, and closing the books. One staff member reported they had also attended trainings at the county office on subjects such as 1099 forms and accounts payable.

The district needs to continue 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, in-service events, cross-training opportunities, the time and financial resources required from employees and the district, and expected outcomes for each activity. Using a standard form to document the plan and reviewing the plan at least annually are also best practices.

Recommendation for Recovery

The district should:

1. 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

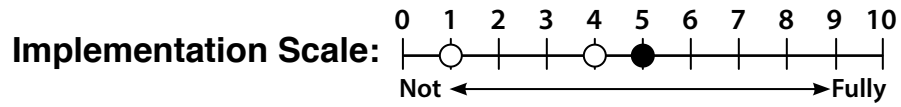
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 4

May 2015 Rating: 5



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.

Findings

1. Some school 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 office published an associated student body (ASB) manual and provided one-on-one training on the policies and procedures discussed in the manual (see Standard 11.1). The CBO and business office staff reported that they are also developing a business office policies and procedures manual and desk manuals for business office technicians. The CBO plans to complete the policies and procedures manual and then provide a comprehensive training to the departments' and schools' staff. The business department also needs to provide school and department staff with annual training that includes information regarding new processes, procedures and forms as well as a refresher in existing procedures that have not been followed as required.
3. Although the district has started developing written guidance for its policies and procedures, it lacks a formal professional development plan business department staff can use to support and train school 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, schools, 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 and department staff members who work in these areas.
2. Provide school 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

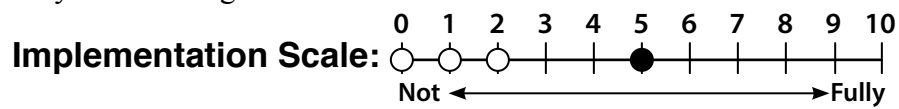
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 2

May 2015 Rating: 5



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.

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 some state-required financial reports are presented, such as interim reports, the district continues to present a fund balance summary report to the board. The report is generated from the Escape financial software system, and is a one-page document for each fund, which shows the budget, actual revenue and expense amounts year to date, encumbrances, unencumbered balance, and percentage of budget available by major object code.
 - Except in months in which some state-required financial reports are presented, the district continues to present a monthly cash flow report by fund to the board. The report is generated from the Escape system and shows actual year-to-date cash transactions by month but does not include projected amounts to year end.
 - The CBO presented information about how to read the district's budget and the Local Control and Accountability Plan (LCAP) at a board study session on March 19, 2014.
 - One board member sits on the LCAP committee and attended committee meetings on February 26 and March 26, 2014.
 - Four board members have graduated from CSBA's Masters in Governance program. At the time of FCMAT's fieldwork, the remaining member had completed all but one training module.
2. Improvement continues in efforts 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 board members focus on the students' and the district's needs. With the change to the Local Control Funding Formula (LCFF) in 2013-14, the board, schools, departments, and community members will need additional training.

At each financial reporting period, except with the 2014-15 adoption budget, the district continues to provide an executive summary that includes a narrative of the district's status, instruction on fiscal and budgeting concepts, and an indication of what to expect in the future. The 2014-15 summary also included a chart showing prior and current year enrollment and ADA comparisons, a spreadsheet with prior and projected years' enrollment data, and charts and graphs from the LCFF calculator. However, additional information such as charts, graphs and basic spreadsheet showing 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; and funds or programs that require a contribution from the general fund. Consistency in the information provided is essential to prevent confusion and highlights the need for continuity in administrative personnel who can provide additional financial analysis to help bridge any gaps in knowledge.

The tools discussed above are fundamental to helping the board understand revenue and expenditure standards and the formulas needed to maintain the district's fiscal solvency while also focusing on students' and the district's needs.

3. A comparison of the district's 2014-15 adopted budget to its 2014-15 first interim report for the unrestricted general fund shows the following:

Comparison of 2014-15 Adopted Budget and First Interim Report

Name	Object Code	Adopted Budget 2014-15	First Interim Report 2014-15	Difference
Revenues				
LCFF Sources	8010 - 8099	\$16,201,795.00	\$16,582,053.00	\$380,258.00
Federal Revenues	8100 - 8299	\$0.00	\$0.00	\$0.00
Other State Revenues	8300 - 8599	\$900,228.00	\$769,361.00	(\$130,867.00)
Other Local Revenues	8600 - 8799	\$72,500.00	\$200,313.00	\$127,813.00
Revenues		\$17,174,523.00	\$17,551,727.00	\$377,204.00
Expenditures				
Certificated Salaries	1000 - 1999	\$6,546,913.00	\$6,327,521.00	(\$219,392.00)
Classified Salaries	2000 - 2999	\$1,916,805.00	\$1,955,275.00	\$38,470.00
Employee Benefits	3000 - 3999	\$2,606,982.00	\$2,558,169.00	(\$48,813.00)
Books and Supplies	4000 - 4999	\$836,369.00	\$1,092,613.00	\$256,244.00
Services and Other Operating	5000 - 5999	\$1,496,378.00	\$1,715,206.00	\$218,828.00
Capital Outlay	6000 - 6900	\$100,000.00	\$104,000.00	\$4,000.00
Other Outgo	7000 - 7299, 7400-7499	\$1,282,457.00	\$1,282,457.00	\$0.00
Direct Support/Indirect Cost	7300 - 7399	(\$18,930.00)	(\$110,444.00)	(\$91,514.00)
Expenditures		\$14,766,974.00	\$14,924,797.00	\$157,823.00
Excess (Deficiency) of Revenues Over Expenditures		\$2,407,549.00	\$2,626,930.00	\$219,381.00
Other Financing Sources/Uses				
Interfund Transfers In	8900 - 8929	\$0.00	\$0.00	\$0.00
Interfund Transfers Out	7600 - 7629	\$0.00	\$0.00	\$0.00
All Other Financing Sources	8930 - 8979	\$0.00	\$0.00	\$0.00
All Other Financing Uses	7630 - 7699	\$0.00	\$0.00	\$0.00
Contributions	8980 - 8999	(\$1,913,253.00)	(\$1,990,104.00)	(\$76,851.00)
Other Financing Sources/Uses		(\$1,913,253.00)	(\$1,990,104.00)	(\$76,851.00)

Name	Object Code	Adopted Budget 2014-15	First Interim Report 2014-15	Difference
Net Increase (Decrease) in Fund Balance		\$494,296.00	\$636,826.00	\$142,530.00
Fund Balance				
Beginning Fund Balance	9791	\$1,158,356.00	\$2,181,605.00	\$1,023,249.00
Audit Adjustments	9793	\$0.00	\$0.00	\$0.00
Other Restatements	9795	\$0.00	\$0.00	\$0.00
Adjusted Beginning Fund Balance	9797	\$1,158,356.00	\$2,181,605.00	\$1,023,249.00
Ending Fund Balance	9799	\$1,652,652.00	\$2,818,431.00	\$1,165,779.00

The district projects that deficit spending will be eliminated in the unrestricted general fund in its 2014-15 adopted budget and first interim report. The multiyear projections from the 2014-15 first interim report show that the district continues to project a net increase in the unrestricted general fund balance of \$1,695,960 in 2015-16 and \$2,767,514 in 2016-17.

The district has drawn all of the funds from the state loan. Of those funds, the 2014-15 first interim report shows that \$2,986,818 remains in the special reserve fund for other than capital outlay projects (fund 17), and \$1,248,728 in the debt service fund (fund 56). The 2013-14 audit indicates that the auditors moved these funds to the general fund through a fund balance transfer. The auditors made no adjustments to the funds held in the debt service fund. The district has not included this audit adjustment in its 2014-15 first interim report, and the calculation of the district's reserves does not include the monies held in fund 17.

As discussed in Standard 14.1, compensation agreements were reached in January 2015 with both employee collective bargaining units for the 2014-15, 2015-16 and 2016-17 fiscal years.

4. The board continues to work on connecting their understanding of student achievement needs with the need to maintain the district's fiscal solvency. To assist them in this, the state administrator and/or staff from the educational services department have provided board workshops and presentations in areas such as unification, healthy kids/school site plans, and board protocol. These efforts will need to continue.

Recommendations for Recovery

The district should:

1. Provide the board with monthly cash flow reports that contain projections through year end.
2. Continue board members' participation in trainings regarding specific aspects of public school finance that will help them carry out their responsibilities as stewards of public funds and help improve student performance.

3. Continue to encourage board members to complete the CSBA's Masters in Governance training.
4. Continue to provide training to the board, school and department staff, and the community regarding LCFF.
5. 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.
6. Continue to monitor the budget to ensure that deficit spending does not recur in the unrestricted general fund.
7. Confer with its auditors regarding entries needed to make the audit adjustment between fund 17 and the general fund.
8. 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

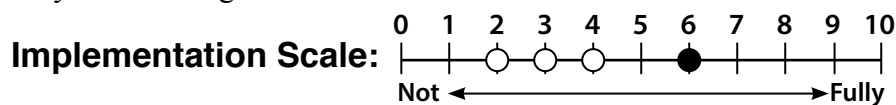
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 3

May 2015 Rating: 6



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.

Findings

1. Staff reported that the district's 2014-15 budget was developed primarily by the CBO. As in the past, involvement of school and department managers was minimal. Interviews revealed that the CBO intends to increase school site and department participation in budget development for fiscal year 2015-16, and to that end has worked with the director of educational services to develop and share spreadsheets for categorical program budgets. If the CBO enlists the participation of school administrators and department heads in budget development 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, minimal input was requested from the board for budget development. The district had formed a budget advisory committee and begun to include community members and district administrators in budget development through that process; however, those meetings were not well attended. The implementation of the LCFF requires districts to complete an annual LCAP, which describes how it intends to meet annual goals for all students in accordance with Education Code sections 52060-52077. To help complete that task, the district has formed an LCAP committee made up of numerous representatives, including certificated and classified staff, a board member, administrators, and the state administrator. Staff reported that the LCAP committee and meetings to obtain input from interested and affected parties have eliminated the need for a separate budget advisory committee.

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 2015-16. Training should include the following:
 - Budget worksheets that show the following:
 - 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

- 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 statutory benefits are 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 they develop.

2. Continue to include input from the governing board and the community in budget development by ensuring that the LCAP committee and meetings seeking input from interested and affected parties are conducted regularly and include a broad spectrum of community interests.

Standard Partially Implemented

February 2010 Initial Rating: 3

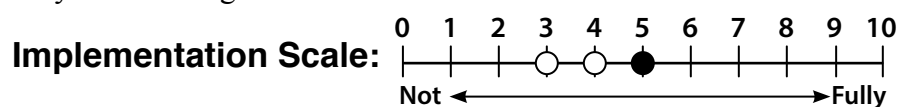
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 5



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.

Findings

1. The district continued to provide training to the board in budget and fiscal matters, including conducting a study session on March 19, 2014 regarding budgets, how to read them, and the LCAP. Also, as indicated in Standard 5.1 and 5.2, the LCAP committee includes a board member. The district's budget must align with the LCAP, which requires each school district to address eight state priorities and describe its annual goals and specific actions to meet each priority. The state LCAP template states, "The LCAP is intended to be a comprehensive planning tool." The district's LCAP was approved by the state administrator at the June 11, 2014 board meeting. No additional list of budget priorities was provided for 2014-15.

Although the district has adopted board policies and regulations regarding the budget and budget development, no written procedures were provided regarding the technical process used for budget development.

2. Carryover continues to be incorporated in 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. 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 year it was designed for, does not include all critical tasks, does not include specific deadlines, 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 LCFF and the need to include public hearings for both the budget and the LCAP. The budget calendar needs to include all 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 if necessary so the administrators understand these priorities and how to implement them during budget development.
2. Continue to prohibit the inclusion of carryover assumptions or estimates during budget development.
3. Revise the budget calendar to include statutory deadlines for all required budget development tasks so each staff member is aware of deadlines and meets them. Ensure that the budget calendar also includes all critical tasks, indicates which staff member will complete them, and provides deadlines for completion.

Standard Partially Implemented

February 2010 Initial Rating: 2

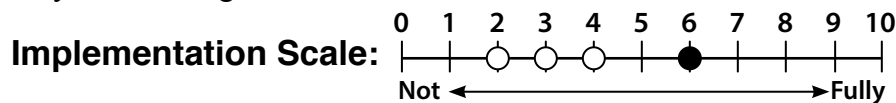
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 6



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.

Findings

1. On February 12, 2014, the district revised BP and AR 3100, Budget, setting forth policies and regulations for its budget and budget development processes. District staff indicated that department managers and administrators continue to be included in board policy review and that they see their suggested revisions in the policies and regulations presented to the board.
2. Department managers and school administrators indicated that they had not been involved in developing their budgets for 2014-15. No worksheets were provided to schools, departments or school site councils during budget development to give them information regarding how their budgets were calculated. However, the CBO and director of educational services met with school principals after school started to share information and spreadsheets regarding categorical program and discretionary lottery budgets.
3. The district's most recent SACS budget document is its 2014-15 first interim report, which was approved by the state administrator on December 9, 2014. The multiyear financial projections (MYFP) contained therein show that the district does not project to deficit spend in the unrestricted general fund in the current or two subsequent fiscal years and that it will exceed the 3% reserve for economic uncertainties.

Following approval of the first interim report, the district settled negotiations for salary and benefit issues with its certificated and classified employee bargaining units for the 2014-15, 2015-16 and 2016-17 fiscal years. The AB 1200 documents presented at the January 20, 2015 board meeting show that the anticipated cost of the settlement over the three-year period is \$1,859,214 and that the district still projects to exceed the 3% reserve for economic uncertainties.

The executive summary included an extensive narrative regarding changes from the adopted budget to the first interim report. However, information regarding the assumptions used for the two subsequent years of the projection were minimal. The following items were included in the narrative:

- Enrollment projections, which project an increase of 197 students from 2013-14 to 2016-17, or approximately 10%
- ADA projections

- Percentage of unduplicated students used in calculating supplemental and concentration grant funding
- Gap funding percentages used in LCFF calculations

The narrative did not list the assumptions used for the two subsequent years for the following items:

- Certificated step and column percentage increase
 - Classified step percentage increase
 - Health and welfare benefits
 - STRS and PERS employer rates
 - Consumer price index
 - Lottery projections
 - Interest rate trends
 - Statutory, federal and state cost of living adjustments (COLAs)
 - Effect of the Affordable Care Act, if any, on employee benefit expenditures
 - Effect of Assembly Bill 1522 regarding sick leave for employees, if any, on employee benefit expenditures
4. District staff provided the LCFF calculations used to develop the 2014-15 first interim report using the LCFF calculator, and a spreadsheet showing categorical and lottery site budget allocations. Staff also indicated that the School Services of California (SSC) Financial Projection Dartboard and California Longitudinal Pupil Achievement Data System (CALPADS) form 1.17 were used. However, no other revenue and/or expenditure worksheets or calculations used to develop the first interim report were provided.

The human resources and business services departments' staff indicated that staffing formulas are not used other than the 35-to-1 student-to-teacher ratio in the collective bargaining agreement with certificated employees.

5. The executive summary of the district's 2014-15 first interim report correctly reflected the carryover balance as shown on the 2013-14 unaudited actuals report. The 2013-14 audited financial statements were not yet completed; therefore, the audit adjustments were not included in the interim report.

The executive summary also listed a few restricted resources with large 2013-14 ending fund balances, particularly Economic Impact Aid with a balance of \$697,110.

6. The district's CDE-approved 2014-15 indirect cost rate is 10.12%. Form ICR in the 2014-15 first interim report, which tracks the application of the district's indirect cost rate to restricted programs, indicates that the rates used in programs varied from 2.04% to 25.01%. The maximum allowable rates vary among programs, some of which have a set rate; for example, the rate for Title III is 2%. Other programs allow the district to charge indirect costs at its approved individual rate, while some, such as vocational education, have a maximum of either 5% or the district's rate, whichever is lower. 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. Form ICR shows that the district is applying indirect costs at rates higher than allowed for some programs, lower than allowed for others, and not at all in others such as special education and vocational education.

Recommendations for Recovery

The district should:

1. Continue to include department managers and administrators in the development and revision of board policies and administrative regulations to ensure current practices and procedures are reflected.
2. Ensure that it includes school sites and departments in budget development for fiscal year 2015-16.
3. Develop and use formulas to allocate staffing and funds to schools and departments.
4. Communicate allocations to schools and departments using spreadsheets with allocation formulas based on criteria consistent with the funding source.
5. Include in its executive summary at each budget reporting period all of the assumptions used for the multiyear projections.
6. Use the most recent version of SSC's Dartboard, the most recent information posted by the CDE, and industry-standard methods when developing and testing revenue and expenditure estimates.
7. Continue to ensure that the ending fund balances from the prior year are correctly posted to the current year, and ensure that all 2013-14 audit adjustments are posted on the 2014-15 second interim report.
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. Continue to closely monitor revenues and expenditures to ensure that financial obligations for the current and two subsequent fiscal years are met.
10. Continue to monitor and project student enrollment and ADA at each reporting period to ensure that the most recent data is included in budget assumptions.
11. Budget and charge the full allowable indirect cost rate for each program.

Standard Partially Implemented

February 2010 Initial Rating: 1

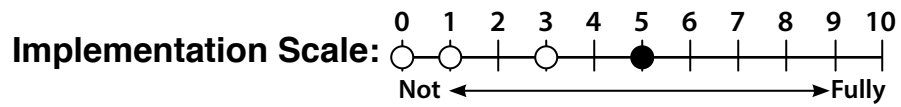
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 0

June 2014 Rating: 3

May 2015 Rating: 5



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))

Findings

1. 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, with annual updates required on or before July 1 of each following year. Public hearings regarding the LCAP and budget are to be held at the same board meeting (section 52062(b) (1)), and the LCAP and budget are to be formally adopted at a single meeting held at least one day after the public hearings (section 52062(b) (2)).

A public hearing was held for the 2014-15 LCAP and budget on May 13, 2014. The minutes of that meeting state that another public hearing for these items would be conducted on May 28, 2014 because the county office did not post the public hearing notice in time. Therefore, a public hearing was also conducted on May 28 for these items. The state administrator adopted the district's 2014-15 LCAP and budget at the June 11, 2014 board meeting, within the statutory timelines established by Education Code (EC) Section 42103.

2. The 2014-15 budget approval letter from the county office, dated August 29, 2014, acknowledged that the district's 2014-15 LCAP had previously been approved by the county office and acknowledged the "District's efforts in the development of a budget and financial plan that provides for the ongoing financial stability of the district." County office staff indicated their office received the 2014-15 budget before the July 1 deadline.
3. This is the fifth 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 August 29, 2014 was not provided 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.

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. Continue to 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.
3. Follow up with the county office 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).

Standard Fully Implemented

February 2010 Initial Rating: 2

March 2011 Rating: 5

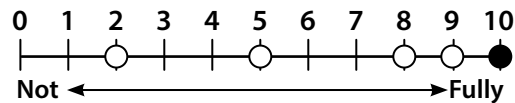
March 2012 Rating: 8

March 2013 Rating: 9

June 2014 Rating: 10

May 2015 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))

Finding

1. On June 20, 2014 Governor Brown signed Senate Bill 852, the 2014-15 State Budget Act, giving the state four consecutive years of on-time budgets. Districts were required to make available to the public information regarding changes to their budgets as a result of the 2014-15 State Budget Act on or before August 4, 2014. To comply with this requirement, the district held a special board meeting on July 31, 2014. The CBO provided information regarding changes to the district's budget as a result of the State Budget Act and other changes to date.

Recommendation for Recovery

The district should:

1. Continue to make available to the public any revisions made to its budget based on funding made available by the relevant year's state budget act in accordance with the statutory deadline.

Standard Fully Implemented

February 2010 Initial Rating: 2

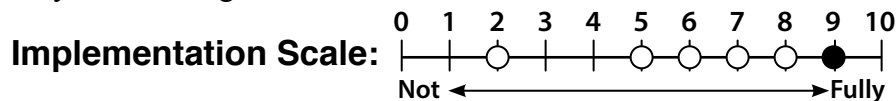
March 2011 Rating: 6

March 2012 Rating: 8

March 2013 Rating: 5

June 2014 Rating: 7

May 2015 Rating: 9



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.

Findings

1. Education Code Section 42130 requires that the second interim report describe the district's financial and budget status for the period ending January 31 and be approved by the governing board/state administrator within 45 days after that. The district's 2013-14 second interim report was included as an action item on the March 12, 2014 board meeting agenda, and the meeting date complies with EC 42130. The minutes from that meeting indicate the item was approved by the state administrator.

The 2013-14 second interim budget review letter from the Monterey County Office of Education indicated that the county office agreed with the district's positive certification, and that the report was submitted on time.

2. Education Code Section 42130 requires that the first interim report describe the district's financial and budget status for the period ending October 31 and be approved by the governing board/state administrator within 45 days after that. The district's 2014-15 first interim report was included as an action item on the December 9, 2014 board meeting agenda, and the meeting date complies with EC 42130. The minutes from that meeting indicate the item was approved by the state administrator.
3. The district's 2014-15 first interim report shows a positive self-certification. Interviews with district and county office staff indicate that the CBO and district business office staff members actively participate in county office trainings and meetings, and that the CBO is responsive to the county office's requests for information.

Recommendations for Recovery

The district should:

1. Continue to file all budget reports with the county office on time and ensure they include a plan to meet all financial criteria and standards for the district's budget as established by the state.
2. Continue to ensure ongoing and productive interactions between its business office and the county office.

Standard Fully Implemented

February 2010 Initial Rating: 3

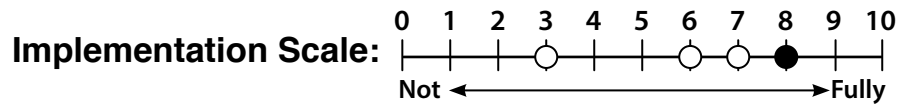
March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 Rating: 8



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.

Findings

1. The county office converted to the Escape financial software system on July 1, 2013. This presented the district with the challenge of retraining all of its online users as well as fielding questions as they arose regarding the new software. The district continued to provide Escape training to applicable staff members during this review period, and some staff members indicated a need for additional training in functions such as viewing accounts online and running reports.
2. Interviews with employees indicated that applicable staff and administrators have access to the Escape system and are able to view accounts and print reports, but, as indicated above, a few are either unaware that they have access or unsure of how to access the information. If assistance is needed with viewing accounts or printing reports, they can call or email the CBO or the business technician, who will guide them through the process. However, this places an additional burden on the business office staff. Additional training could reduce the time all parties spend on these issues and give users a greater feeling of control and participation in budget monitoring.
3. 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. Because the online purchase requisition system will not allow a purchase that exceeds the line item budget (unless the control has been turned off at the district level), the business office staff no longer monitor account line balances before placing orders.

However, the Account Component Summary-Balance report, dated January 6, 2015, shows that some expenditure lines have negative account balances. Most of the negative balances are relatively small; however, each should be reviewed and adjustments made as needed to ensure expenditures do not exceed the authorized budget.

4. Interviews with employees indicated that some school administrators and department managers are now able to initiate budget transfers online, which are then routed to the CBO for final approval. District office staff reported that this ability is being phased in gradually throughout the district, and the process is discussed further in Standards 2.1 and 10.5.
5. District staff continue to present the board with a summarized monthly budget update as described in Standard 5.1. The reports generated from Escape show revenues and expenditures by major object code group. For example, the report is displayed by

fund and shows all certificated salaries on one line. Staff members also present interim budget reports to the board as required by the Education Code; these reports include multiyear budget projections.

6. The CBO and director of educational services met with school principals after the start of the 2014-15 school year to share information and spreadsheets regarding categorical program and discretionary lottery budgets. However, some school staff members reported confusion about whether or not they are able to access categorical budgets online in Escape. Interviews with employees also indicated that the director of educational services is responsible for approving requisitions online for categorical programs before they are transmitted to the CBO for final approval.

Members of school site councils indicated that the categorical budgets were presented to them in the fall and that examples were provided regarding the use of funds. However, they were unsure whether carryover was included in the budget presented. Interviews with employees also indicated that the new director of educational services attended a school site council meeting at one of the high schools to discuss the composition of the council, its functions, and other pertinent topics.

Recommendations for Recovery

The district should:

1. Continue to provide staff with training in the Escape online purchase requisition system and account coding.
2. Continue to provide staff with training in Escape to increase their proficiency in viewing accounts and running reports.
3. Monitor all expense accounts routinely and make adjustments to ensure expenditures do not exceed the authorized budget.
4. Continue to give school and department managers the ability to initiate online budget transfers, and provide them with training. Provide staff with instruction in how to compile the backup documentation needed to support budget transfers.
5. Ensure that school and department managers are instructed to monitor their budgets using Escape and held accountable for doing so.
6. Continue to present monthly budget reports to the governing board; however, expand them to provide more detail.
7. Continue to provide school site staff and school site councils with information regarding categorical funding, including the resources available and which expenditures are appropriate for each resource.

Standard Partially Implemented

February 2010 Initial Rating: 2

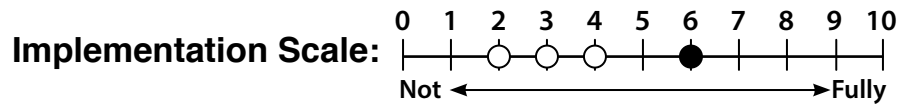
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 6



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.

Findings

1. The district implemented the Escape financial software system starting on July 1, 2013. This software has a fully integrated position control module, which drives payroll. The module also encumbers payroll using the end-of-month payroll information, extrapolates it to an annual amount, and updates 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 Microsoft Excel spreadsheets for position control functions. This has also eliminated the need to periodically compare 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.

A review of the Positions with Assignments and Accounts report dated January 9, 2015 and interviews with staff indicate that amounts for the following have been incorporated into the position control system:

- Stipends
- Substitutes
- Hourly/extra duty/overtime
-

However, items that have not 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

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 stipends and retiree health and welfare payments.

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 employees only for authorized positions, and that payroll staff pay

employees hired for authorized positions. Proper separation of duties is a key factor in creating strong internal controls and a reliable position control system.

In interviews, staff indicated that the human resources department is responsible for entering employee demographic data in the system, assigning each employee to a position, and placing them on the salary schedule. The CBO enters new positions in the system using a position requisition form, and the payroll/benefits technician processes the monthly payroll. The CBO also periodically compares position control and payroll information for accuracy.

3. Unilateral personnel decisions made by school site and department administrators can have a 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 school administrators' understanding of their role in the employment process, have continued to eliminate hiring outside of the normal personnel procedures during this review period. 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 adding to the payroll fictitious individuals or individuals who do not work for the district; these procedures include the following:
 - An employee's demographic information must be entered into the position control module before payroll can be processed.
 - The payroll/benefits technician has view-only access to employee demographic screens.
 - A reconciliation of payroll is performed, tying the current month's payroll to the prior month.
 - An employee not responsible for processing payroll receives the paychecks from the county office and distributes them to sites and departments.
 - Position control is compared to actual payroll at each interim reporting period.
 - Each employee must sign a distribution list when they pick up their paycheck or pay stub.

These procedures have enabled staff to readily detect payroll errors, and staff indicated that very few payroll errors have been reported during this 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.
2. Continue to update position control as changes are made to ensure 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 overpayment or underpayment of payroll.

Standard Fully Implemented

February 2010 Initial Rating: 1

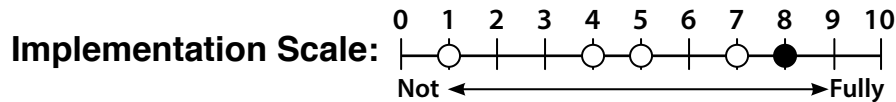
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 7

May 2015 Rating: 8



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.

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 board packet for the June 11, 2014 meeting did not include cash flow projections.

The cash flow reports provided with state-required budget reports include the actual year-to-date and projected ending cash balances for each month. However, the monthly cash flow summary reports presented to the board 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 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 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 2014-15 first interim report, the remaining proceeds have been deposited and accounted for as follows: \$2,986,818 in Fund 17, Special Reserve Fund for Other than Capital Outlay Projects; and \$1,248,728 in Fund 56, Debt Service Fund.

The district's 2014-15 first interim report cash flow projections indicate that the district will not draw from fund 17 in fiscal year 2014-15. This projection includes the following conditions for 2014-15:

- July 1, 2014 beginning general fund cash balance of \$2,684,984.
- June 30, 2015 ending general fund cash balance of \$2,361,485.

Staff had previously indicated that some of the remaining emergency loan funds may be needed for payments because of audit findings. On July 28, 2014, the Education Audit Appeals Panel issued a decision adopting the Stipulated Agreement "completely settling and resolving the appeal of Audit Findings 11-23, 11-25, and 11-27" for the sums of \$85,600, \$94,393 and \$73,776, respectively. The CBO reported that the district has not determined whether the general fund or fund 17 will be used for payment of the settlement.

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 correct payroll errors. The district has established an RCF in the amount of \$6,000 that is operated through a separate bank checking account. During the previous 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 revolving, clearing and cafeteria accounts for September, October and November 2014 did not include a copy of the register balance to confirm the amount on the monthly bank reconciliation form. Review of the cancelled checks in those same bank statements revealed that one check was issued with only one signature instead of the two signatures required.

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. Continue to 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 and include both the bank statement and a copy of the check register.
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, and ensure that each check issued has two signatures.

Standard Partially Implemented

February 2010 Initial Rating: 1

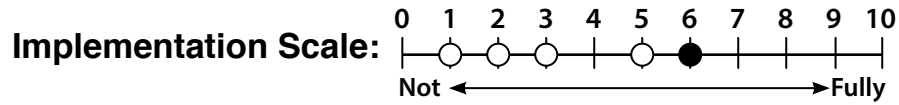
March 2011 Rating: 2

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 5

May 2015 Rating: 6



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.

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 CBO reported that the county office also allows manual payroll runs each month so districts can correct payroll errors or process items that were not submitted on time. During previous review periods, the district typically waited until the next payroll cycle to correct errors. The CBO indicated that the district now uses a manual payroll run to correct them.

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 district has hired a payroll/benefits technician who has relieved the CBO of the duty to process payroll. The payroll/benefits technician is responsible for entering payroll/timesheet information into Escape, reconciling the current month's payroll, and providing the reconciliation and preliminary payroll list to the CBO for review and approval. The preliminary payroll list is then submitted to the Monterey County Office of Education to produce the payroll warrants, which are returned to the business technician in the district office. The payroll/benefits technician prints the payroll distribution lists and provides them to the business technician, who is responsible for separating 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 signed distribution lists are also returned to the district office for filing. The payroll/benefits technician reconciles the payroll vendor warrants and the business technician mails them to vendors.

Having a payroll/benefits technician position has strengthened the business office internal controls to 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.

Although the payroll/benefits technician has been with the district for approximately one year, her previous experience was outside of a school district and payroll. Consequently, continued training will be vital to ensure she has the knowledge necessary to fulfill her job duties.

3. The district uses a monthly payroll reconciliation spreadsheet to balance the month-end payroll and has developed a reconciliation spreadsheet for the supplemental and manual payrolls to help ensure 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 payroll/benefits technician completes payroll reconciliations for each payroll, and the CBO reviews and approves the reconciliations. However, of the six sample reconciliations provided, none were signed and dated by the preparer, only two had been initialed by the reviewer, and none contained a date of review. Staff indicated that some payroll questions had arisen during this review period but few payroll errors. Errors were corrected promptly; the largest problem reported to FCMAT was a check torn during mailing. Although this was not a district error, the check was replaced quickly.

4. County office staff continue to report that the district has submitted payroll reports on time, responds quickly to inquiries regarding payroll and retirement reporting, and continues to work to reduce reporting errors.

Recommendations for Recovery

The district should:

1. Continue to ensure that payroll errors are corrected in a timely manner, in compliance with Education Code Section 45167.
2. Continue to provide the payroll/benefits technician with supervision and training to ensure they have the most current information on all matters relevant to the task.
3. Continue to ensure that the employee responsible for processing payroll does not also review and sign the preliminary payroll list or have access to the pay warrants after they are processed by the county office.
4. Continue using the payroll reconciliation spreadsheets for each pay cycle, and the personnel action form.
5. Ensure that the payroll reconciliation spreadsheets are signed and dated by the preparer and reviewer to provide for proper internal controls and more thorough tracking.

Standard Partially Implemented

February 2010 Initial Rating: 2

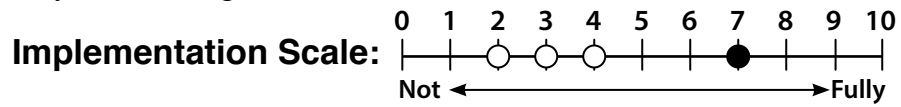
March 2011 Rating: 4

March 2012 Rating: 3

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 7



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.

Findings

1. Average daily attendance (ADA) generates the majority of the district's funding. The 2013-14 state budget included the Local Control Funding Formula (LCFF), which significantly changed the way school districts are funded. 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 foster youth, English learners, or eligible for free and reduced-price meals. The district's unduplicated pupil count is reported through the California Longitudinal Pupil Achievement Data System (CALPADS). 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.
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 help with data entry and reporting. Staff members directly responsible for entering and reporting student attendance received this desk manual. According to district procedures, school attendance clerks are trained to generate the following reports daily, weekly or monthly to test the accuracy of data input at the schools and to identify unexcused absences and possible truant students:

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

Attendance Audit listing: To ensure accuracy of enrolled students on the 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 periodically to verify the accuracy of the student attendance reported at the schools. 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 between Aeries and CALPADS. Exceptions or unusual variances are examined further for possible reporting errors. The senior director of information technology prints Aeries system audit reports and reviews the final reports for accuracy and performs testing for reasonableness.

The data system analyst and senior director of information technology attend regular trainings hosted by Aeries as well as trainings offered at the county office of education.

Both comprehensive high schools run daily attendance reports. These reports are used to verify the accuracy of the attendance and then make corrections as needed. Based on attendance information generated through the second period of the day, automatic phone calls are sent to parents at 10 a.m. advising them that their student is absent or has missed a period. These absences are cleared throughout the day, and in the case of an uncleared absence, another automatic phone call is made to the parent at 6 p.m. Occasionally, some teachers do not take attendance by second period; in these cases, a phone call is made when the student is actually present in class. Attendance office staff and site administrators are working to train these teachers on the importance of timely attendance recordkeeping.

Mandatory weekly attendance reports are generated 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 they have valid teacher signatures. This procedure was implemented following audit findings in the state controller's audit report for 2010-11 that would have resulted in a loss of approximately \$300,000 in funding. As discussed in Standard 8.1, the Education Audit Appeals Panel has issued its decision regarding the amounts owed by the district, which will be repaid in the 2014-15 fiscal year.

4. 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.

School support staff report that while teacher recording of student attendance has improved, there are still certain teachers who periodically fail to sign their weekly report and/or take attendance in a timely manner. The district needs to continue efforts to hold accountable any teacher who fails to complete an accurate and/or timely record of attendance. School administrators have instructed support staff to review signed attendance reports to verify the teachers' signatures at all schools, and support staff reported the number of unsigned and/or late attendance reports has decreased during 2014-15.

5. School personnel work closely with the district's data system analyst, school counselors and assistant principals regarding truancy. Notification letters are sent to parents and/or guardians as required, and following the second notification of truancy, habitual truants are referred to the county district attorney's office.
6. The Aeries support team, composed of district support staff and school personnel, meets regularly throughout the school year. According to school staff, attendance training for school personnel is provided during the school year, but a comprehensive training opportunity before the start of the school year was not provided in 2014-15. Mandatory annual training before the start of school would give staff the opportunity to clarify procedures and ensure that any new laws and/or regulations are communicated in a timely manner.

Aeries support meetings occurred throughout the 2013-14 year. Sign-in sheets from these meetings for 2014-15 were provided only for September 2014. Staff reported the district has scheduled monthly meetings beginning in January 2015 through the end of the current fiscal year.

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 after the business manager and senior director of information technology review them and before they are submitted to the state. 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. During this review period, the district cross-trained staff to ensure that essential functions can be maintained in the absence of the data system analyst. District staff used the self-paced CALPADS online training provided by California School Information Services (CSIS) as well as support from Aeries.

Recommendations for Recovery

The district should:

1. Provide 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. This training should include new attendance accounting procedures and changes in state regulations.
2. Use a sign-in sheet for all Aeries and other attendance accounting trainings to provide evidence these meetings are conducted on a continuing basis.
3. Provide continued training to all teachers on the importance of completing accurate attendance records, and hold them accountable to Education Code and CCR requirements.
4. Continue to review signed attendance reports to verify teachers' signatures.
5. Ensure that there is adequate training and cross-training for CALPADS reporting.
6. Require staff to use the online CALPADS training provided by CSIS.

Standard Partially Implemented

February 2010 Initial Rating: 3

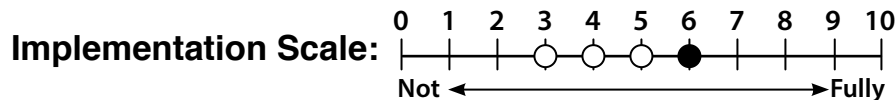
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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.

Findings

1. The district adopted 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. Changes to California's Independent Study Program statutes were implemented for the 2014-15 and 2015-16 years. Most of the provisions became effective on the date Senate Bill (SB) 858 was signed, except for Section 38 of the bill, which becomes effective in 2015-16. Some provisions of SB 858 made changes to the existing program and others created new independent study statutes. Changes to the existing statutes, which became effective upon the governor's signature, include:
 - Calculating the student-to-teacher ratio caps by grade span instead of district average
 - Allowing for alternative student-to-teacher ratio caps to be collectively bargained
 - Eliminating the requirement for supervising teachers in independent study programs to sign and date each assignment when assessing the time value of pupils' work products for apportionment purposes
 - Allowing required documents to be maintained electronically

New provisions effective beginning in 2015-16 include:

- Allowing local governing boards to convert entire courses, instead of individual assignments, into instructional time for funding purposes
- Requiring twice monthly student and teacher communication to assess whether the student is making satisfactory educational progress
- Requiring statewide testing results for independent study students to be disaggregated for comparison purposes
- Prohibiting any student from being assessed a fee or being prevented from participating because they do not have the equipment or materials

The district will need to review these statutes and modify its board policies, administrative regulations and practices for its independent study program as appropriate.

4. Independent study attendance is processed electronically using the Aeries system.
5. The district's independent study charter school closed on June 30, 2012. The district has not authorized any other charter schools.
6. District staff reported that some periodic review of attendance procedures occurred, but a formal internal audit has not been conducted. These audits test the validity of the attendance reported for apportionment purposes. It would benefit the district to conduct internal audits for independent study attendance accounting and all other programs.

Recommendations for Recovery

The district should:

1. Review the new and revised independent study statutes, and modify board policies, administrative regulations and practices as appropriate.
2. Perform periodic internal audit procedures to test the validity of attendance reported for apportionment purposes.
3. Provide mandatory annual attendance training regarding independent study.

Standard Partially Implemented

February 2010 Initial Rating: 1

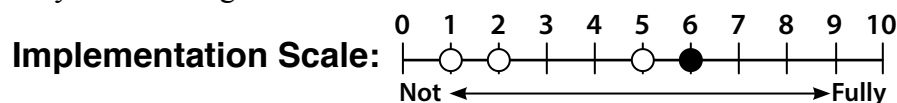
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 2

June 2014 Rating: 5

May 2015 Rating: 6



9.4 Attendance Accounting

Professional Standard

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

Findings

1. The district has provided 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 comprehensive high school has one attendance clerk.
2. During the previous review period, the district returned truancy and ASB responsibilities from the district to the school sites, and combined these with the registrar function. Although registrars reported a significant but manageable increase in their workload, there is concern about the sustainability of this arrangement over the long term. There is a significant need to coordinate activities with the attendance clerks to ensure accurate identification of student truancy; from time to time a student is identified as truant when they are not, or vice versa.
3. Weekly attendance reports from schools are used to verify district-level system reports. Schools have the ability to run daily audit reports, which can identify exceptions or discrepancies that can be corrected during the current period. Schools are encouraged to run daily attendance reports to verify accuracy and spot check for tardies, habitual truants and unexcused absences. District and school staff indicated that each school prepares daily reports.
4. The attendance clerks at each comprehensive high school compile information on student tardies and absences from Aeries reports as a basis for sending notices to parents or guardians. The registrar then prepares and distributes the notices. Parents or guardians can view their students' attendance record on the parent portal section of the district's website.

Recommendations for Recovery

The district should:

1. Continue 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 all staff members are familiar with current regulations and any changes in the Aeries attendance system.

3. Ensure that all schools enter student data into the Aries student information system and continue to run audit reports daily to highlight conflicts or concurrent enrollment exceptions.
4. Continue to monitor the effectiveness of the structure under which school sites are responsible for ASB and truancy functions, and make adjustments as needed to ensure consistent, accurate and timely attendance reporting and truancy monitoring.

Standard Partially Implemented

February 2010 Initial Rating: 3

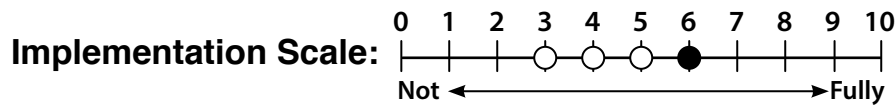
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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.

Findings

1. The Monterey County District Attorney's Office aggressively enforces the Education Code 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 school 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 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 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 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 three or more days following the T1 and T2 letters, the

third letter, referred to as T3, is issued, and the student and parent/guardian must attend a court-ordered mediation or hearing.

The registrar at each school is responsible for issuing first and second truancy letters to parents/guardians, and although the school counselor is responsible for sending the final truancy letter, the registrar often completes this task. The Aeries student information system produces the letters, eliminating a cumbersome manual process used prior to the 2014-15 school year.

Staff from each comprehensive high school held meetings with parents/guardians of truant students during this review period, though some gaps were noted from time to time in the monthly meeting schedule. The meetings were held to discuss ramifications of chronic truancy for students and the parents'/guardians' responsibility to ensure that their student attends school. Sign-in sheets indicate meetings are attended by approximately half of the parents/guardians asked to attend.

5. As a result of past efforts, including consistent use of the three notification letters, parent contacts, staff training, and communication among district staff and school sites, both comprehensive high schools experienced a drop of approximately 80% in truancy during the 2011-12 school year.

Truancy letters and communication with parents or guardians are documented in the student record on the Aeries system. These notations include the date of communication, to whom staff spoke, and the substance of the conversation.

6. The district's student enrollment has declined over the past 10 years. However, staff reported this trend was expected to reverse beginning in 2014-15, and projects enrollment will continue to increase for at least the next two years. Staff also reported student attendance rates have increased in the last few years. However, supporting documentation provided for the first four attendance months in 2014-15 indicates King City High School's attendance rate is approximately 96%, compared to 97% in prior years, while Greenfield High School's rate is approximately 95%, which is consistent with prior years.
7. The district offers Saturday school to students with unexcused absences but does not provide student attendance incentive programs to encourage regular student attendance, other than the off-campus lunch privileges at King City High School. Incentives and rewards can provide positive reinforcement for a variety of student accomplishments and activities. Several studies, including Brooks 1979, Bry 1982 and Wanza 1996, include examples of incentive strategies.

Recommendations for Recovery

The district should:

1. Continue working with students, parents and the county district attorney's office to enforce attendance policies.

2. Continue to provide training and written procedures to employees who have truancy responsibilities.
3. Continue to ensure that the truancy notification to parents is accurate, timely and fully documented in the Aeries system.
4. Determine whether the current staffing configuration for truancy duties is adequate.
5. Consider implementing student attendance incentive programs to help promote attendance and improve student attendance rates.

Standard Partially Implemented

February 2010 Initial Rating: 1

March 2011 Rating: 6

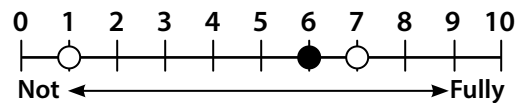
March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 6

May 2015 Rating: 6

Implementation Scale:



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.

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. Aeries 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. New employees responsible for CALPADS reporting need to receive training using the Eagle Software manual.

The data system analyst and senior director of information technology use online Aeries Yahoo discussion and support group and Aeries.net attendance training for professional development purposes. The Aeries support team includes this training in regular training for school site personnel to ensure that school staff achieve the highest level of accuracy with the student information system. The senior director of information technology 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. Documentation provided to the study team indicated no meeting was held after September 2014; however, staff reported the meetings would be held regularly beginning January 2015.

2. The district is working to implement the previous recommendation to cross-train all school office personnel in attendance procedures so they can provide coverage when another employee is absent. Staff at both comprehensive high schools reported there has been little training in this area, but they do support each other and work well as a team.
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 needed to give timely notification to teachers, administrators and parents when students are absent, tardy or truant.
4. Accurate reporting of student data in CALPADS, which are uploaded to the CSIS database and ultimately transmitted to the CDE, requires 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 2014-15 school year. The official CALPADS report 1.17, FRPM/English Learner/Foster Youth – Count, shows an unduplicated student count of 1,732 and a total enrollment on information day

of 2,013, indicating that 86.0% of the district's total enrolled students are classified as English learner/low income (EL/LI). This is an increase of 5.4% compared to the 2013-14 Fall 1 report.

This percentage will be used for LCFF supplemental and concentration grant funding, which is 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. Concentration funding will be added for 31.0% (86.0% minus 55.0%) 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 and document Aeries support team training monthly.
3. Ensure that employees responsible for CALPADS reporting receive adequate training, and that management provides proper oversight and resources to support CALPADS identification and reporting functions.
4. Continue to ensure that district office and school 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

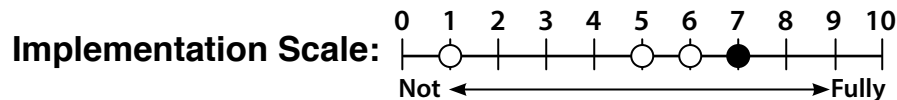
March 2011 Rating: 5

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 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.

Findings

1. The business office was restructured during the past year and now includes a chief business official, one payroll/benefits technician and one business technician. The payroll/benefits technician began employment with the district in February 2014, and the business technician began in September 2014; therefore, training staff and documenting systems remains a significant undertaking.

With 3.0 full-time equivalent (FTE) positions to process accounting transactions, it is less challenging than in previous review periods for the district to provide the separation of duties needed to ensure an effective internal control environment. Like many small entities with limited personnel, the district has arranged duties so 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.
 - 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.
 - Accounts payable and payroll check distribution is the responsibility of a staff member other than those who generated the checks.
 - Employee signatures are required for payroll checks.
 - 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 chief business official's signature, the district will not be responsible for the goods ordered.
2. Having 3.0 FTE positions in the business office has enabled the district to meet its financial statement deadlines. However, cross-training is needed, and internal controls need to be strengthened in the areas of journal entry review, county treasury cash reconciliation, bank account oversight, and ASB cash receipts. Also, interviews with staff indicated that the business technician has access to vendor demographic and payment screens, which is a weakness in internal controls because any one individual should not

have financial system access that allows them to alter vendor data, add vendors and make vendor payments. Staff reported that these areas are the focus of new procedures being implemented in the current year.

3. Staff reported that journal entries required because of account coding errors are no longer a major issue. However, the district's lack of a review process for journal entries was reported as a repeated finding in its June 30, 2014 audited financial statements. Staff reported that journal entries are now processed electronically on the Escape system, which requires approval from the chief business official.
4. The audited financial statements for the fiscal year ending June 30, 2014 included three adjustments: one to decrease cash with fiscal agent; one to properly accrue categorical program funds; and one to move funds from fund 17 to the general fund to comply with Governmental Accounting Standards Board (GASB) Statement No. 54. Although a pattern of decreasing adjustments existed, from five in the 2011 report to three in 2012 and one in 2013, the number increased to three in the 2014 report. This and the nature of the audit findings in the 2014 report cause concern regarding the district's ability to accurately record its financial activities.
5. The 2014 audit findings included the following:
 - Failure to maintain a capital asset list and calculation of depreciation. This item was a repeat finding, and is the basis for continuance of the auditor's qualified opinion regarding the district's financial statements. Staff reported asset accounting is being conducted by staff as part of purchasing procedures, a physical inventory will also be conducted, and a firm will be contracted to prepare asset accounting records, including the calculation of depreciation.
 - Insufficient supporting documentation for ASB cash receipts. This finding was repeated from the previous year.
 - Not reviewing or preparing a reconciliation of the cash in county treasury. However, the auditor noted the district does not receive from the Monterey County Office of Education the information needed to complete this work. This finding was repeated from the previous year.
 - Controls to review journal entries were not in place. This is a repeat finding from the previous year.
 - Internal controls over year-end adjustments were insufficient, resulting in audit adjustments to properly state revenue, accounts payable and accounts receivable.
 - Lack of oversight over district banks accounts. This item was a repeat finding from the previous year.
6. Education Code Section 41020(h) states 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 day of the auditor's fieldwork for fiscal years 2010-11 and 2011-12 was after the statutory deadline of December 15. Fieldwork for the 2012-13 and 2013-14 fiscal year audit reports was completed on November 25, 2013 and December 9, 2014, respectively, showing an improvement in district preparedness. 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 the financial statements were issued.

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..." Governing board meeting minutes indicate that the report was presented to the board on January 20, 2015.

7. External, independent audit findings continue to identify internal control weaknesses and material weaknesses. Material weaknesses generate a higher level of concern because they are significant deficiencies that result in a greater 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, 2010-11 through 2013-14

	2010-11	2011-12	2012-13	2013-14
Type of Auditor's Report Issued	Qualified	Qualified	Qualified	Qualified
Going Concern Finding	Yes	Yes	Yes	No
Material Weaknesses Identified	Yes	Yes	Yes	Yes
Significant Deficiencies Identified	Yes	Yes	Yes	Yes
Noncompliance Material to Financial Statements Noted	Yes	Yes	Yes	No
Total Number of Financial Statement Audit Findings	14	16	7	6
Total Number of Federal Award Audit Findings	5	4	2	0
Amount of Federal Award Questioned Costs	\$639,629	\$21,601	\$13,667	\$0
Total Number of State Award Audit Findings	9	5	1	0
Amount of State Award Questioned Costs	\$631,788	\$118,166	\$0	\$0
Total Number of Audit Findings	28	25	10	6
Total Questioned Costs	\$1,271,417	\$139,767	\$13,667	\$0

The above table shows that the district has successfully reduced its audit findings from a high of 28 in 2010-11 to six in its last audit for the 2013-14 fiscal year. Of particular significance, the auditor did not present a lack of going concern finding for the first time since the state loan was issued. Although a decrease in audit findings indicates that the district's efforts continue to yield results, the inability of the district's auditors to issue an unqualified report, and the findings of material weaknesses in internal controls, show there is room for improvement.

Recommendations for Recovery

The district should:

1. Continue to review and revise procedures to increase separation of duties and oversight in the business office.
2. Ensure that staff are cross-trained in key functions, including budget development and monitoring, payroll, and accounts payable.
3. Review and revise policies, procedures and internal control measures to help reduce audit findings.

Standard Partially Implemented

February 2010 Initial Rating: 2

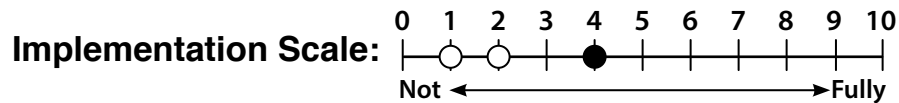
March 2011 Rating: 2

March 2012 Rating: 2

March 2013 Rating: 1

June 2014 Rating: 4

May 2015 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.

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, 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, 2012-13 and 2013-14 included audit findings indicating the district's capital assets were not auditable, leading the auditors to issue a qualified opinion.

2. The district uses its staff to conduct periodic physical inventories and has assigned asset accounting duties to the technology department. The technology department is ensuring that all technology and other items are tagged; however, there is some confusion over who is responsible to tag and enter into the system non-technology items with a purchase price of \$500 or more. For example, the maintenance department staff reported being uncertain whether they had responsibility for their department's asset accounting.

For new items, the business technician notifies the senior director of information technology of the asset, and the technology department then tags and records the item. A copy of the master inventory report generated on January 30, 2015 lists 3,230 records of items such as furniture, business machines, computers, printers, audio visual equipment and other items totaling \$4.6 million.

3. Staff reported the district is contracting out a complete valuation of its fixed assets, including the calculation of depreciation. The final report will affirm amounts included in the district's financial statements, including land and building valuations. The work of the asset contractor was not complete at the time of FCMAT's fieldwork.

4. Staff reported that purchase orders are processed in one to two days. The district uses the Escape software's online purchase requisition module. District staff were given training in the Escape purchasing module, and the chief business official has provided much one-to-one support to staff members at the district and schools. However, several staff members desire additional training to reinforce their knowledge of and proficiency in using the requisition system. In addition to basic training, staff would benefit from an annual in-service before the start of school that includes training in both the online requisition system and account coding.
5. The district no longer receives equipment shipments at the warehouse; rather, goods are shipped to their destination and fixed asset accounting is conducted by the technology department staff at the site. Goods are received with a packing slip so that the originator can verify they received what is listed on the slip. After the originator has verified that the package contents and the packing slip match, they sign the packing slip and return it to the district office.
6. Staff reported that purchase orders are required for all purchases; no findings in this regard were noted in the 2013-14 audit. Although staff reported that from time to time a purchase is completed before a purchase order is submitted, this has occurred much less frequently over the last year.
7. 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 needed, staff reported they use one of two methods to process the transfer:
 - The staff member prepares and submits an electronic budget transfer, which is processed by the business office technician and then reviewed and approved by the chief business official.
 - The staff member contacts the chief business official to authorize, prepare and process the transfer.

Once budget issues are resolved, the requisition is forwarded to the business office.

- Any supporting documents for the requisition are scanned and uploaded into the Escape system.
- The business technician reviews the account coding.
- The chief business official 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 director of educational services or the director of alternative education also approves any purchase requisition charged to a categorically funded program.

- The approved purchase order is then mailed or faxed to the vendor and delivered to the originator.
- When an approved invoice is received, the business technician processes it for payment and prepares the accounts payable batch. Accounts payable warrant batches are prepared weekly. The chief business official 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 payroll technician for distribution to the payees.

Recommendations for Recovery

The district should:

1. Complete its valuation of district equipment and capital assets, including the calculation of depreciation, and ensure the information supports fixed asset data included with the district's financial statements.
2. Provide all employees who use the online requisition system with additional training as well as an annual in-service that focuses on how to use the purchasing module and the proper account coding of requisitions.
3. Provide all school and department managers with training that will enable them to prepare and submit budget transfer requests electronically on the Escape system.
4. Require that all purchases have an authorized purchase order in advance of the purchase.
5. Clarify with staff their responsibilities for fixed asset accounting procedures.

Standard Partially Implemented

February 2010 Initial Rating: 1

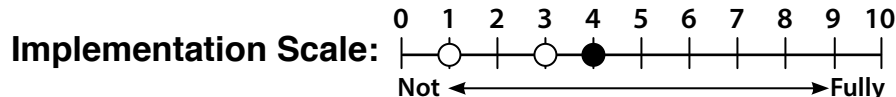
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 3

May 2015 Rating: 4



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)

Findings

1. During this review period the district continued to divide ASB bookkeeping functions between the district office and school sites. The district office continues to process ASB revenues, verify cash counts, make bank deposits, reconcile bank statements and issue checks. Schools are responsible to ensure that the ASB and its clubs have proper organizational documents, initiate transactions (such as fund-raisers, revenue/cash, purchase orders, vendor payments, and reimbursements), compile documents to comply with checklists for those transactions, record accounts payable transactions in the ASB Blue Bear software, and mail vendor payments.

On August 7, 2014, the district published an ASB documentation procedures and instructions manual and has provided one-on-one training on those procedures to school personnel who have ASB accounting duties. Although school administrators and staff reported that they are more comfortable in their roles related to ASB than they were during the last review period, a few expressed the desire for more training; in addition, the district has a new ASB advisor at one school. The maintenance, operations, transportation and facilities (MOTF) technician continues to provide any training needed on the ASB accounting software and, with the CBO, answers questions regarding procedures. School ASB personnel reported that they also have access to the FCMAT ASB manual. 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 immediate initial training for new ASB personnel.

2. Although having manuals that provide sample forms and documents and define the various roles and duties of employees responsible for ASB activities and functions is an extremely positive step, it is not a substitute for board policy and administrative regulations; these are particularly important now that ASB functions are being performed at school sites.
3. 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.
 - Fundraising 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.
4. The district has not developed or implemented formal administrative regulations (ARs) that support Board Policy 3452; however, it has created an ASB manual and identified which staff members are accountable for various ASB functions including cash collection, recordkeeping, processing purchase requisitions, ASB oversight at the schools, ASB leadership, and training.

It would benefit the district to adopt an official AR that memorializes its efforts as evidenced by the ASB manual and the list of ASB roles and responsibilities. Such an AR would provide a formal way for the board to ensure effective administrative oversight by including the ASB manual in the AR, and validate the district's determination of the roles and responsibilities of personnel involved in managing student body activities and funds. In addition, having ARs in place would reinforce the district's efforts to address this long-standing issue. Although the district has addressed many of the items listed below in other documents, the AR would serve as a complete and encompassing policy that ties the various documents together and includes at least the following:

- The roles and oversight responsibilities of the board, superintendent, business office, school principals, ASB advisors, and ASB leadership council
- Applicable laws and regulations that govern operations, fundraising 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 fundraising 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's new ASB manual has met the district's previous need to develop procedures for oversight and management of ASB funds and to clearly segregate the responsibilities of district staff and school ASB personnel to ensure that proper internal controls are maintained over student body funds. The manual does not specifically address internal audits; however, it provides checklists for each type of ASB transaction, which include the district office in each process. Internal audits may be superfluous as long as the district office continues to prepare the deposits and issue checks; however, as these

functions are returned to the schools, internal audit procedures will need to be reviewed and carried out where necessary.

Recommendations for Recovery

The district should:

1. Adopt and implement formal administrative regulations to support Board Policy 3452, and to validate the new ASB manual and the district's determination of the roles and responsibilities of personnel involved in managing student body activities and funds. At a minimum, the topics listed above should be included in the administrative regulations.
2. Provide annual training for ASB advisors and other school personnel who have ASB accounting responsibilities. Provide new ASB personnel with immediate and thorough training.
3. Consider including internal audit procedures in ASB processes as deposit and check issuance duties are returned to the schools 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

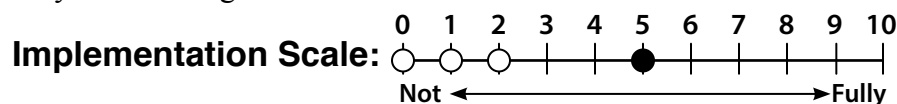
March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 2

May 2015 Rating: 5



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.

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 thousand 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 policies, procedures and standards of conduct. Cash continues to be collected at the schools and transferred to the business office. The MOTF technician is responsible for making bank deposits, and the CBO is responsible for reconciling the bank statements.

Although King City High School is on the same campus as the district office, and school staff bring the deposits to the office, Greenfield High School is located approximately 11 miles away. Greenfield uses a bus driver to take the sealed money bag to the district office; however, there is no documentation to provide evidence the bus driver picked up or delivered the money bag. This arrangement does not meet the standards for effective internal controls. If the district continues this deposit procedure, the bus driver should be required to sign for the money bag when it is picked up and the MOTF technician should sign for receipt of the bag when it is delivered.

2. Cash deposits counted at the school 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 school for verification and internal control purposes, placed in a sealed deposit bag, and then deposited directly in the local bank by a school employee. Subsequent bank deposit verification could 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 above. FCMAT's discussions with the CBO about this potential change revealed that, although the district is contemplating the change in the near future, it plans to monitor and reinforce transaction procedures and timeliness first.
3. As discussed in Standard 11.1, the district has not developed or implemented formal administrative regulations that support Board Policy 3452 but has created an ASB manual and identified which staff members are accountable for various ASB functions including cash collection, recordkeeping, processing purchase requisitions, ASB oversight at the schools, ASB leadership, and training. Since release of the ASB manual to the schools, the district has provided one-on-one training to school staff assigned with ASB responsibilities and provides rapid responses to questions.

Club advisors had previously expressed frustration regarding changes in district guidelines and a cumbersome approval process for ASB fundraising events. With the publication of the ASB manual and its checklists, this has been alleviated to a great degree, but staff reported that it can still take more time than anticipated to process transactions.

A previous lack of communication between the ASB advisors and the district office has been resolved to some extent. One ASB advisor reported that they were able to communicate directly with the district office and the other reported that their communications occurred through the school principal. Developing direct communication strengthens the relationship between the district office and the schools and makes school personnel more comfortable with reporting instances when policies and procedures go awry within the internal control structure.

4. The district's audited financial statements showed one ASB audit finding for fiscal year 2013-14 and one for the 2012-13 fiscal year.

The finding for 2013-14 related to King City High School. Auditors discovered the following:

- One out of ten cash receipts tested lacked supporting documents.
- Five out of the ten cash receipts tested were missing adequate supporting documents to reconcile the amount collected to the amount deposited.

Some of the same conditions were found at Greenfield High School in 2012-13. Auditors reported the following:

- Four of the ten disbursements tested lacked supporting documents. One of the four was also noted to be an inappropriate expenditure.
- Five of the ten cash receipts tested was missing adequate supporting documents to reconcile the amount collected to the amount deposited.
- One of ten cash receipts was not deposited on time; a month elapsed between collection and deposit.

The district's publication of an ASB manual provides each school with a consistent basis for ASB transactions, which strengthens the district's internal control management. However, some staff members were unsure whether audit findings were shared, and ASB advisors reported that they were not aware of the findings. Not sharing the findings with those that are responsible for transactions and who can implement needed changes places the district at risk of the same situations repeating themselves as is the case above. Providing the schools with the ASB audit findings and holding them accountable to resolve the findings is necessary to reinforce the internal controls.

Recommendations for Recovery

The district should:

1. Revise its cash delivery procedures to require that the person picking up money bags sign for their receipt and the person accepting them at the district office to sign for delivery.
2. When the schools are ready to accept responsibility for deposits, revise its cash deposit procedures to allow the schools to deposit funds directly to the bank without an additional count at the district office.
3. Develop direct communication between ASB advisors and school staff assigned ASB duties and district office personnel.
4. Continue training school personnel, including ASB advisors, in processes and procedures.
5. Provide school administrators and staff tasked with ASB functions with audit findings and require them to provide a plan for resolving them.

Standard Partially Implemented

February 2010 Initial Rating: 0

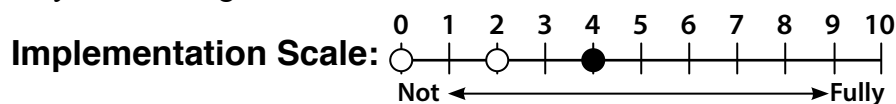
March 2011 Rating: 0

March 2012 Rating: 0

March 2013 Rating: 2

June 2014 Rating: 4

May 2015 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)

Findings

1. A review of the district's 2013-14 second interim report and 2014-15 adoption budget and first interim report indicates that the district provides multiyear financial projections (MYFPs) for the general fund at each reporting period. Most reports included a list of assumptions used in developing the MYFPs; however, many industry-standard assumptions were not addressed (see findings 2 and 3 below), only some 2014-15 assumptions were presented with the 2014-15 preliminary budget, and none with the 2014-15 adopted budget (see finding 3 below).
2. The assumptions provided with the 2013-14 second interim budget report narrative presented to the board in March 2014 did not address student enrollment or average daily attendance projections, staffing allocations, or step and column increases. Analysis of reserve levels was presented.
3. The assumptions provided with the 2014-15 preliminary budget report narrative presented to the board in May 2014 did not address student enrollment or average daily attendance projections, staffing allocations, or step and column percentage increases. No narrative was provided with the adopted budget presented to the board in June 2014. A reserve analysis was not presented.
4. The narrative for the 2014-15 first interim report presented to the board in December 2014 addressed assumptions for enrollment, staffing, revenues and expenditures for the 2014-15 year, but only enrollment, ADA and LCFF data for the MYFP. A reserve analysis was also presented.
5. The district's most recent MYFP was completed with the January 20, 2015 collective bargaining disclosure and included the following projected amounts for the district's unrestricted general fund:

	2014-15	2015-16	2016-17
Increase/(Decrease) in Fund Balance	\$538,028	\$1,244,186	\$1,923,191
Unrestricted Ending Fund Balance	\$2,719,633	\$3,963,819	\$5,887,010
Reserves as a % of Expenditures (1)	28%	36%	45%

(1) Includes fund 17, special reserve, balance

The MYFP shows that the district has recovered fiscally, with operating surpluses in each year of the multiyear financial projection and reserve levels greater than the state minimum requirement of 3% for economic uncertainties.

An increase in funding from the LCFF state funding model has played a key role in the district's fiscal recovery. The district received a significant increase in funding to improve the educational achievement of English learners, students from low-income families, and foster youth; the district is to use these resources to increase and/or improve services for these students.

Unused state loan proceeds of \$2.9 million held in fund 17 are included as a separate component of the available reserves shown in the general fund MYFP completed for the collective bargaining disclosure. The narrative accompanying the first interim report states a portion of the funds are being held in anticipation of the payments that will be due to the state for audit findings from fiscal years 2010-11 and 2011-12. The Education Audit Appeals Panel decision issued on July 28, 2014 indicates that the district owes the state \$253,679 for resolution of three of the 2010-11 audit findings.

The projection also includes annual debt service payments of approximately \$1.24 million for the state loan. The loan's 20-year repayment period began in 2010-11.

Recommendations for Recovery

The district should:

1. Ensure that all MYFPs include a detailed list of assumptions that use the most current information available.
2. Ensure that amounts reserved for items such as audit findings are properly identified in the budget and MYFP.
3. Ensure that adequate funding is allocated to increase and/or improve services to English learners, students from low-income families, and foster youth students.

Standard Partially Implemented

February 2010 Initial Rating: 1

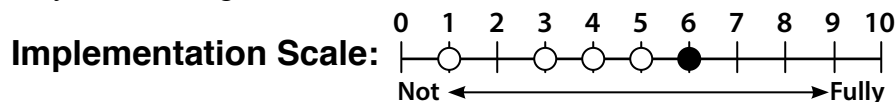
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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)

Findings

1. On August 14, 2014, the state administrator approved several collectively bargained memoranda of understanding (MOUs) with the district's certificated employee association for July 1, 2013 to June 30, 2015, and with its classified employee association for July 1, 2013 to June 30, 2014. As discussed in Standard 14.1, multiyear financial projections were included as part of the public disclosure forms presented at the meeting. However, as also noted in Standard 14.1, disclosure forms were presented several months after some components of the agreements were implemented.
2. On January 20, 2015, the state administrator approved the collective bargaining agreement with the district's certificated employee association for July 1, 2014 through June 30, 2017. As discussed in Standard 14.1, public disclosure documents, including an MYFP, were prepared and included in the board packet.
3. On January 20, 2015, the state administrator approved the collective bargaining agreement with the district's classified employee association for July 1, 2014 through June 30, 2017. As discussed in Standard 14.1, public disclosure documents, including an MYFP, were prepared and included in the board packet.
4. Board members reported that the state administrator and chief business official keep them informed of fiscal issues and planning assumptions, and they feel confident regarding the district's fiscal condition and direction.

Recommendations for Recovery

The district should:

1. Present public bargaining disclosure documents, including MYFPs, to the board in a timely manner.
2. Continue to ensure that guidelines developed for collective bargaining align with the goal of fiscal solvency.

Standard Partially Implemented

February 2010 Initial Rating: 1

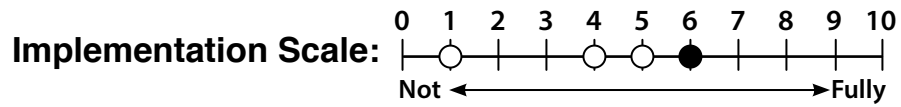
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 6



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))

Findings

1. The August 14, 2014 board agenda included a public hearing titled “AB 1200 Contracts.” The minutes of this meeting indicate staff reported this item was “cleanup” after completion of negotiations with the bargaining units for the new contracts.

The board agenda for August 14, 2014 also included three action items:

- Approval of California School Employees Association (CSEA) Agreement – CSEA Negotiations 2013-14
- Approval of California Teachers Association (CTA) Agreement – CTA Negotiations 2013-14
- Approval of CTA Agreement – CTA Negotiations 2014-15

Agreement with CSEA for 2013-14

The tentative agreement with the CSEA bargaining unit was signed on March 19, 2014, almost five months before the public disclosure and board action. The agreement provided for two days of professional development for members of the bargaining unit, specifically June 2 and 3, 2014, which occurred more than two months before the disclosure was presented at the board meeting.

The governing board meeting date listed on the cover page of the CSEA disclosure form was August 13, 2014; the actual date of the meeting was August 14, 2014. The disclosure narrative indicated the settlement would reduce deficit spending, yet the agreement increased the projected deficit. The certification of the district’s ability to meet the costs of the agreement was not signed by the state administrator or the chief business official.

Agreement with CTA for 2013-14

The disclosure included four MOUs with the CTA bargaining unit: two dated July 19, 2013, one dated December 17, 2013, and one dated May 28, 2014, many months prior to the board meeting of August 14, 2014.

The governing board meeting date listed on the cover page of the CTA disclosure form was August 13, 2014; the actual date of the meeting was August 14, 2014. The disclosure narrative indicated the settlement would reduce deficit spending, yet the agreement increased the projected deficit. The certification of the district’s ability to meet the costs of the agreement was not signed by the state administrator or the chief business official.

Agreement with CTA for 2014-15

The disclosure included six MOUs with the CTA bargaining unit dated between November 7, 2013 and May 28, 2014; five of the six were for implementation during the 2014-15 year, and one was for the 2013-14 year.

The governing board meeting date listed on the cover page of the CTA disclosure form was August 13, 2014; the actual date of the meeting was August 14, 2014. The certification of the district's ability to meet the costs of the agreement was not signed by the state administrator or the chief business official.

2. The January 20, 2015 board meeting agenda included two public hearings: one for the "AB 1200 CSEA Contract," and one for the "AB 1200 KCJUHSDTA Contract." The agenda also included approval of disclosure forms for agreements with both units, and approval of multiyear collective bargaining agreements. Board packet documents included signed disclosure certification forms, and district staff reported the disclosure forms were presented to the county office more than 10 days before the board meeting.

Compensation agreements were reached with both bargaining units for the 2014-15, 2015-16 and 2016-17 fiscal years.

3. District staff reported no other MOUs were negotiated during the last year.

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

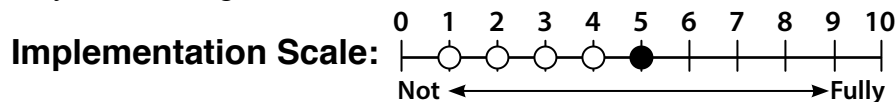
March 2011 Rating: 4

March 2012 Rating: 3

March 2013 Rating: 2

June 2014 Rating: 3

May 2015 Rating: 5



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)

Findings

1. The March 12, 2014 board meeting agenda included an action item titled “Approval of ‘Sunshine’ Proposal for Negotiations with CSEA and the SMCJUHSD.” The bargaining unit’s proposal included articles regarding pay and benefits for the 2013-14 year. No corresponding district sunshine of its proposal was presented on this agenda.
2. The October 8, 2014 board meeting agenda included four action items to sunshine (meaning to disclose publicly) negotiation proposals: one from CSEA to the district, one from the district to CSEA, one from the King City Joint Union High School District Teachers Association (KCJUHSDTA) to the district, and one from the district to KCJUHSDTA for the 2014-15 year. The district’s proposal documents included value statements regarding student achievement and fiscal responsibility.
3. The November 3, 2014 board meeting agenda included two public hearings: one regarding the proposals sunshined between CSEA and the district, and one regarding the proposals sunshined between KCJUHSDTA and the district at the October 8, 2014 board meeting.
4. As discussed in Standard 14.1, the district settled negotiations for 2014-15 through 2016-17 with its certificated and classified employee bargaining units. A notice was posted regarding the public hearing to be conducted at the January 20, 2015 board meeting, at which public comment would be received on the major provisions of the agreements. The required public disclosure documents associated with the collective bargaining agreements with the certificated and classified bargaining units were presented prior to ratification as required by Government Code Section 3547.5.
5. As discussed in Standard 14.1, the district negotiated various MOUs with its certificated and classified employee bargaining units. Some of the MOUs were not presented in a timely manner 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

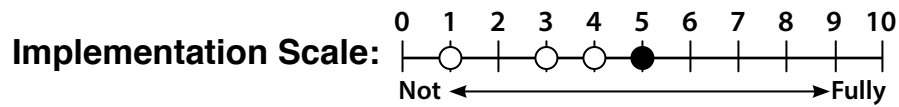
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 Rating: 5



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.

Findings

1. Board meeting agendas and minutes, as well as 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 2014-15 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 values:

The South Monterey County Joint Union High School District has a commitment to the fundamental values of:

1. Obtaining increased academic achievement for all students at high levels of engagement, rigor, and accomplishment
 2. Close the achievement gap between all student groups
 3. Obtain long-term fiscal solvency and responsibility
 4. Serving students in facilities that are safe and healthy
 5. Governance that is focused on student achievement, accountable by all staff and inclusive of the entire community
3. Employees interviewed indicated that the state administrator continued to include management staff members on the district's negotiating teams for the 2014-15 collective bargaining agreements. The district's team for classified negotiations included the state administrator, chief business official, senior director of human resources, and senior director of information technology. The team for certificated negotiations included the state administrator, the chief business official, the senior director of human resources and a principal. Including management 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.

4. The chief business official prepared a fiscal impact analysis of the tentative salary and benefit agreements with both bargaining units for the 2014-15, 2015-16 and 2016-17 fiscal years. Staff reported the analysis was reviewed by the district's bargaining team and the board in closed session before settlement with the units. The tentative agreements were approved by the state administrator at the January 20, 2015 board meeting.

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 management staff members, such as the chief business official and the senior director of human resources, on the district's negotiating teams.
3. Continue to present information to the board of trustees regarding collective bargaining matters, including setting parameters for the costs of compensation.

Standard Fully Implemented

February 2010 Initial Rating: 2

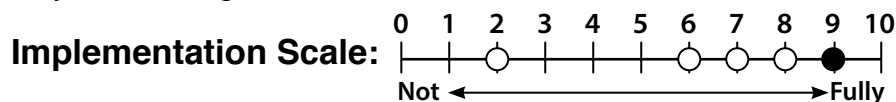
March 2011 Rating: 6

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



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.

Findings

1. 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.

Two significant problems still remain to be resolved: the inability to easily generate classified seniority reports and evaluation due date reports. Although data has been entered, the Escape system's current configuration does not allow a user to easily generate timely and accurate reports. Discussions with district staff and county office finance support staff indicate that district staff need additional training and that the Escape system needs further configuration to resolve this situation.

2. A student assessment system, Aeries Analytics, was purchased during the 2013-14 fiscal year because the district wanted more tools to analyze student assessment data to improve learning. This assessment system was selected by the senior director of information technology with only limited input from others. Two days of training were provided to district staff using a train the trainers model. Staff indicated that the Aeries Analytics system is rarely used, and the district has begun searching for a replacement system.

The director of educational services is leading the group that is evaluating possible replacement systems. The group consists of a wide range of participants including the senior directory of information technology, instructional assistants, department chairs, and site administrators.

It is a best practice to ensure that software applications such as student assessment systems and other critical applications are carefully selected by a committee of interested parties, including technology and education leaders. A careful process that defines outcomes of the software use and required training and support are vital parts of the selection process.

Recommendations for Recovery

The district should:

1. Contact the county office's Escape support staff and work with them to re-evaluate the Escape system's current configuration related to classified seniority and evaluation due date reporting, and ensure that adequate training on the system is obtained.
2. Continue to follow the selection process used to replace the student assessment system when evaluating new software applications, and include a wide range of participants that includes technology and education leaders.

Standard Partially Implemented

February 2010 Initial Rating: 3

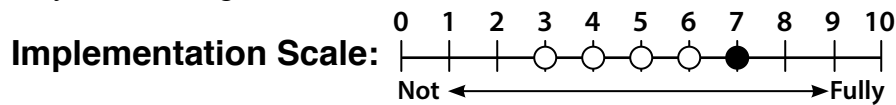
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 6

June 2014 Rating: 7

May 2015 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.

Findings

1. The district has an Aeries support team that strives to meet regularly to provide ongoing support and sharing among those involved in attendance reporting. This team is led by the senior director of information technology and includes the data system analyst, school-based student support staff, and secretaries and registrars from both comprehensive high schools. The team is designed to create a collaborative process for attendance and student support personnel to exchange information.

Although the goal of the team is to hold monthly meetings, a training session was conducted in September 2014 and the next meeting is scheduled for late January 2015. At a minimum, these meetings should be held before the start of school each year to ensure that all parties are aware of any significant changes to the Aeries system, district or state reporting requirements, and any other important changes.

2. Staff training in use of the Escape financial software system has been widespread with many district office and site staff expressing confidence in their use of the system. The county office provides initial and ongoing training, and district staff members also provide training. In interviews, employees indicated that several staff members desire additional training to reinforce their knowledge of and proficiency in using the system.
3. Documentation of the CALPADS student reporting system and the process for direct certification of students who qualify for free or reduced-price meals was completed by the senior director of information technology. These documents include step-by-step procedures as well as methods for validating this data. In addition, at least two staff members are cross-trained in the use and support of these systems.

Recommendations for Recovery

The district should:

1. Ensure that the Aeries support team meets before the start of each school year to discuss any changes to Aeries, district or state reporting requirements, and other relevant topics. The team should also meet regularly during the year to discuss additional changes and user issues.

2. Continue to provide employees with Escape training as needed and/or requested.

Standard Partially Implemented

February 2010 Initial Rating: 0

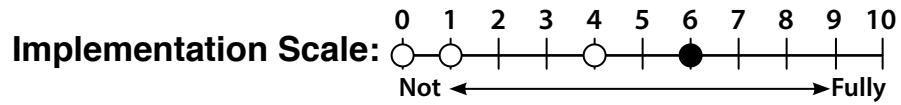
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 4

May 2015 Rating: 6



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.

Findings

1. The district has developed a comprehensive technology policies and procedures manual designed to complement and support its technology plan. The manual offers users guidance, policies and procedures regarding email etiquette, web page publishing, privileges for students and staff, 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 senior director of information technology prior to purchase. However, several staff members, including principals, were not aware of the documented hardware or software standards. This document was not published on the district's website at the time of FCMAT's fieldwork.

The technology policies and procedures manual needs to be readily available via the district website so teachers, principals, department leaders, purchasing staff and others can easily access and refer to it.

2. The software standards section of the manual states the following:

The following are supported server and workstation operating systems, network components and district applications:

Novell NetWare, Linux, Windows 2008, Windows 2003, Microsoft Windows 98, 2000, XP, Local Area Network, Gigabit Backbone, TCP/IP, CSME circuits to the internet, GroupWise, Aeries, MS Office 2010.

This section is inadequate because the list is grouped together without any breakdown of which software or components listed are used for which purpose, such as server, workstation, operating systems, network components or district applications. Many of the software products listed, such as Microsoft Windows 98, 2000, and XP, are old and no longer supported by Microsoft.

To be meaningful and useful in defining standards, this section needs to be written for users and include more detail about types and versions of software supported on users' devices such as desktops, laptops and tablets. Any differentiation between software standards used for students, teachers, or support staff also needs to be documented.

3. The documented hardware standards include both laptop and desktop models. However, there is no differentiation between models for students, teachers, and support staff. Districts often have different standards for these users because of diverse needs for items including monitor sizes, storage capabilities, performance, and other characteristics. Including separate hardware sections in the manual for different types of users would help clarify any differences in user needs and subsequent support.

Recommendations for Recovery

The district should:

1. Publish the technology policies and procedures manual on the district's website and send email notifications to employees when the document is updated.
2. Update the manual to include greater detail, such as software titles and versions, and separate software items by section, including server, workstation, network and district applications. Any differences in standards for students, teachers, and support staff should also be included.
3. Update the manual to indicate any differences in hardware standards for students, teachers, and support staff.

Standard Partially Implemented

February 2010 Initial Rating: 0

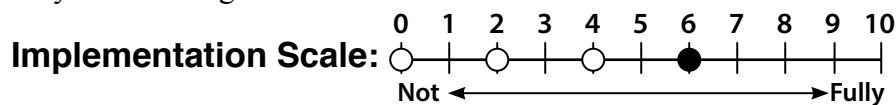
March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 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.

Findings

1. The district maintains its technology asset inventory in the web-based California Property Record Systems (CPRS). CPRS is a comprehensive, centralized inventory system that tracks technology devices at all sites. Inventory of all assets, technology and non-technology-related, is to be performed annually and is the responsibility of the senior director of information technology.

There is some confusion in the district regarding who is responsible for inventorying particular categories of assets. This lack of clear delineation of responsibilities can lead to incomplete or inaccurate reporting and analysis of the district's assets.

The technology inventory is reportedly 90% accurate; most inaccuracies are because an incorrect location of the asset was entered in the CPRS system. Inaccurate location of assets can often lead to the loss, theft, or underutilization of assets.

2. The CPRS system is able to produce reports based on the purchase order and/or acquisition date of computers. According to the senior director of information technology, the goal is to replace computers when they become five years old. However, the technology plan only states that aging computers will be replaced; it does not include a formal replacement schedule.

The senior director of information technology is able to use the data from the CPRS system to guide the purchase of new computers. During the 2014-15 fiscal year, the district replaced more than 200 computers in classrooms and computer labs at the comprehensive high schools. The previous fiscal year, approximately the same number of computers were replaced.

3. Total cost of ownership is a factor in district purchasing decisions, and has resulted in the standardization and purchase of only Windows-based computers with which the limited number of technology support staff are familiar. The technology staff install Faronics' Deep Freeze software on computers, allowing easy recovery of changed or corrupted systems.

Recommendations for Recovery

The district should:

1. Document the inventory process, clearly delineating which asset inventory data each department and/or site is responsible for. This document should also include detailed information regarding district staff members' responsibilities.
2. Develop a formal equipment replacement schedule for desktop systems and associated peripherals. This will allow for the development of an accurate and ongoing multiyear budget for device replacement.
3. Improve the accuracy of data on the location of assets in the technology asset inventory. Review with all staff the importance of completing asset transfer location documents before relocating assets.

Standard Partially Implemented

February 2010 Initial Rating: 0

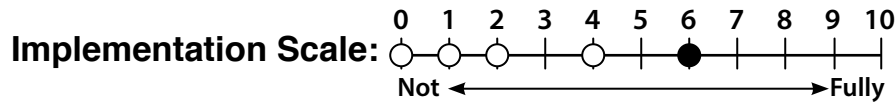
March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 2

June 2014 Rating: 4

May 2015 Rating: 6



16.1 Maintenance and Operations Fiscal Controls

Legal Standard

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

Findings

1. Staff indicated that the district's technology department will conduct the physical inventory and that all inventoried items will be recorded in the Escape software system beginning in 2014-15.
2. The district hired a consulting firm in May 2014 to develop land values to comply with the requirements of GASB Statement 34. The consultant included opinions of estimated original costs and estimated dates of acquisition.
3. The master inventory report dated January 30, 2015 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, 2013 and 2014 audit reports continue to include findings indicating that the district's capital assets were not auditable. This resulted in the auditors issuing a qualified report.
4. 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 for newly acquired assets and assets designated as surplus. However, in interviews employees expressed some confusion regarding whether the MOTF technician position is responsible for placing an asset tag on non-technology equipment that has a purchase price of \$500 or more and entering this information into the inventory software.
5. Board meeting agendas and minutes for this review period include items regarding the disposal of surplus property, including textbooks, technology equipment, a bus and two vehicles. In 2013 the district entered into 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 60510-60530; and California Code of Regulations, Title 5, sections 3944 and 3946 prescribe methods for disposing of district property. How these methods are used depend on whether the value of the property is more or less than \$2,500. The board agenda and supporting documentation provided to FCMAT for several surplus sales included information about the value of the surplus property and method of disposal, except for 200 desks presented at the April 16, 2014 board meeting.

Recommendations for Recovery

The district should:

1. Continue to conduct a physical inventory of all fixed assets with a current market value of more than \$500 at least once every two years.
2. Complete implementation of a fixed asset accounting system that will calculate depreciation, and reconcile amounts in the system with asset information included with the unaudited actuals financial report.
3. Continue including approval for the disposal of surplus property on the board agenda and following procedures to remove these items from the fixed asset inventory.
4. Ensure that all board agenda items related to surplus property include information indicating whether the combined value of the items exceeds \$2,500 and the method to be used for disposal.

Standard Partially Implemented

February 2010 Initial Rating: 0

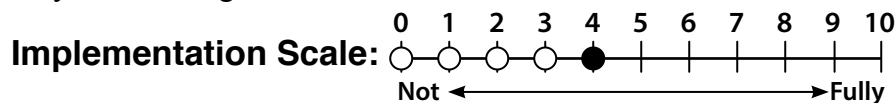
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 4

May 2015 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.

Findings

1. The district participates in the National School Lunch and Breakfast programs. The district contracts with Sysco Foods, Inc. to provide meals for breakfast and lunch that meet the daily nutritional requirements.

The CBO continues to lead the district's food services department. Staff in food service lead positions oversee day-to-day operations at each school and report directly to the CBO, who oversees all aspects of the food service program.

2. The food service program underwent a Nutrition Services Division (NSD) investigation in August 2013. The required corrective action plan the district submitted resolved all concerns, and the CDE closed the investigation on January 14, 2014. As a result of the investigation, the district has contracted with and continues to use a food service consultant to ensure compliance and continued staff training. At the time of FCMAT's fieldwork, the next NSD visit to the district was scheduled for February 2015.
3. The district does not maintain a food service warehouse; instead, relies on vendors to provide ready-to-serve meals that its staff heat and serve. The district's primary vendor for its food services operations is Sysco. The CBO has attended food shows in an attempt to expand and vary the food served to students as well as maintain compliance with federal and state nutritional regulations; however, inclusion of new foods has been limited because some vendors do not serve the district's geographical area.
4. The food service program uses the district's standard purchasing and accounts payable processes, which are discussed in Standard 10.5.
5. The audited financial statements for the fiscal years ending June 30, 2013 and June 30, 2014 show that the auditors made no adjustments to the cafeteria accounts to present them in accordance with Generally Accepted Accounting Principles (GAAP).

Findings regarding food service functions were noted in the audited financial statements for the fiscal years ending June 30, 2013 and June 30, 2014. The finding for 2013 related to the fact that second letters for free and reduced-price meal verification were not sent, and the district implemented the auditors' recommendation. For the 2014 audit, an immaterial variance between the district's general ledger and bank reconciliation was noted. The auditors have made their recommendation to correct this condition, and the release of the 2015 audit will provide their evaluation on its implementation.

Recommendations for Recovery

The district should:

1. Continue to monitor and adjust food offerings, revising menus periodically.
2. Ensure that the 2013-14 audit finding is corrected.

Standard Partially Implemented

February 2010 Initial Rating: 5

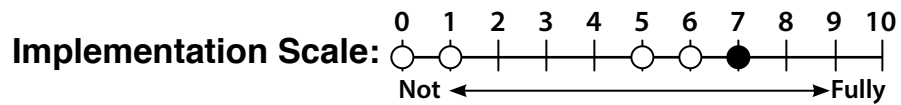
March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 6

May 2015 Rating: 7



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.

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
2012-13 unaudited actuals: resources 3310, 6500	\$992,150	\$2,089,643
2013-14 unaudited actuals: resources 3310, 6500	\$831,381	\$2,067,183
2014-15 projected budget: resources 3310, 6500	\$1,178,281	\$2,627,231

Although both contributions and expenditures in fiscal year 2013-14 decreased from the prior year, they are projected to increase in 2014-15. Careful analysis and investigation of increases to expenditures is essential for cost containment.

FCMAT's previous review found that an account summary by object balance report dated January 28, 2014 showed that resource 3310 had a projected ending balance of \$56,540 for 2013-14. Allowable special education expenditures needed to be moved from resource 6500 to resource 3310 so that there would be no remaining fund balance in resource 3310; this would also reduce the projected contributions from the unrestricted general fund. A review of the final account summary by object balance report for 2013-14 showed that resource 3310 had required an unrestricted general fund contribution, indicating that this issue had been corrected.

2. Unlike 2011-12 and 2012-13, the district no longer performs interagency services between LEAs. Therefore, amounts for revenue and expenditures for these items are not included in the district's budget. The 2014-15 account summary by object balance report shows several negative balances for employees' salaries and benefit accounts as of January 6, 2015.
3. In 2010-11, the district began operating two classes for severely handicapped students that formerly were operated by the county office. The district operates one class with two teachers 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 and is now considering moving the transition program back to the district beginning with the 2015-16 school year.

4. The district still 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.
5. The Monterey County Office of Education special education billback 2014-15 dated January 6, 2015, and the 2014-15 special education local plan area (SELPA) local assistance distribution (resource 3310) dated June 13, 2014, show that the district budgeted the amounts indicated in these reports. However, the 2014-15 SELPA AB-602 distribution to districts (resource 6500) dated June 13, 2014 shows \$707,379 to be provided to the district but both the adopted and revised district budgets show \$650,000. Including the correct amount will reduce both the budgeted expenditures and the unrestricted general fund contribution. It is a best business practice for the district to use the most recent revenue and cost estimates from the county office and SELPA to develop and revise its budget at each reporting period.

A comparison of the amount posted for billback expenses in the district's 2013-14 account summary by object balance report versus the amount shown in the Monterey County Office of Education special education billback 2013-14 dated September 4, 2014 shows that the district booked an additional \$92,893 in expense to this category. The county office routinely withdraws the amount it anticipates for total billback expenses and then adjusts to the actual amount once it knows its final expenses. The district expects to receive an adjustment for the \$92,893 at some point during the 2014-15 fiscal year.

The CBO reported that the district's budget for 2014-15 special education billback is estimated to be \$105,475 for the second interim. The county office's December billback projection shows that expenses for the educational program will be \$127,593, which would indicate the district's budget should be adjusted. However, with the credit noted in the above paragraph, the district may have overbudgeted this line item and should reassess this amount at second interim.

6. The 2013-14 Special Education Maintenance of Effort Actual versus Actual MOE calculation (SEMA) report included in the district's unaudited actuals, after adjustments made by the county office, shows that the district met its maintenance of effort (MOE) requirements under both the combined state and local expenditures and local expenditures only methods.

The 2014-15 first interim special education MOE report, SEMAI, indicates that the district projects that it will meet its MOE requirement using the combined state and local expenditures method.

7. During the prior 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. This configuration continues into the current review period, except that the director position is currently vacant. The CBO reported that he prepares the MOE calculation and that the prior director was not involved in the calculation.

8. 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 (LEA) Medi-Cal billing option. Staff indicated that the district is not participating in either reimbursement program in 2014-15.
9. Education Code Section 56362 provides for a maximum caseload of 28 students per resource specialist program (RSP) 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. District administrators indicated that because of vacancies that are proving difficult to fill, the district's RSP caseloads will exceed 28 for the 2014-15 school year; however, the waiver had not been filed at the time of FCMAT's fieldwork.

To resolve this situation, the district has implemented various measures including the following:

- Hired an independent contractor to provide speech services while the district's speech and language pathologist serves as an RSP teacher
- Pursued contracted services for RSP case management while using a substitute teacher, who is not qualified to manage IEPs, to provide instruction services
- Negotiated additional compensation for its RSP teachers for caseloads of more than 28

Even with these measures, staff reported that RSP teachers at King City High School have caseloads that exceed the 28-student limit by 15 to 19 students.

Recommendations for Recovery

The district should:

1. Analyze and investigate increases in special education expenditures.
2. Continue to ensure that all allowable special education expenses are charged to resource 3310 so that the resource does not have a projected ending balance.
3. Review the 2014-15 budget line items for employee salaries and benefits 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 other agencies and for program changes prior to implementation.

7. Calculate and charge the allowable indirect costs to all restricted programs to accurately show total program costs.
8. 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.
9. 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.
10. 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.
11. 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.
12. Apply for a waiver from the State Board of Education as soon as possible to allow resource specialists' caseloads to be increased to 32 students, and implement measures to decrease caseloads to no more than 32.

Standard Partially Implemented

February 2010 Initial Rating: 1

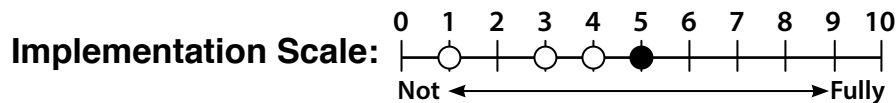
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 4

May 2015 Rating: 5



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.

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
2012-13 unaudited actuals: resources 7230 and 7240	\$251,390	\$560,120
2013-14 unaudited actuals: function 3600	\$260,303	\$809,250
2014-15 projected budget: function 3600	\$-0-	\$585,311

With the change in funding to LCFF, transportation revenue is now an add-on and is no longer tracked by a separate resource code. As a result, the district's transportation expenditures are accounted for in unrestricted resource code 0000 for home-to-school transportation and resource 6500 for special education transportation. Both resources show the assignment of function 3600 to account code strings. Because of these account code changes, an unrestricted general fund contribution will no longer be made so analysis of this is rendered ineffective.

However, using the 3600 function code and comparing those expenditures to the former resource codes remains a relevant method for analyzing the district's transportation program. Separating the budget into the five major expense categories shows the following:

	2012-13 Actuals	2013-14 Actuals	Difference From Prior Year	2014-15 Budget	Difference From Prior Year
Salaries	\$124,516.76	\$174,534.65	\$50,017.89	\$198,939.00	\$24,404.35
Benefits	\$48,213.31	\$77,445.23	\$29,231.92	\$124,063.00	\$46,617.77
Materials & Supplies	\$93,734.50	\$115,325.54	\$21,591.04	\$115,335.00	\$9.46
Professional Services	\$293,655.81	\$377,546.13	\$83,890.32	\$46,974.00	\$(330,572.13)
Equipment	\$-	\$64,398.75	\$64,398.75	\$100,000.00	\$35,601.25
TOTAL	\$560,120.38	\$809,250.30		\$585,311.00	

This chart shows that the district had the largest expenditure increases in 2013-14 over those of the prior year in three areas: salaries, professional services, and equipment. Comparing budgeted expenses for 2014-15 with actual expenses in 2013-14 reveals that although increases are expected in salaries, benefits and equipment, the district is anticipating a significant decrease in expenditures for professional services specifically related to the county's billback costs. The county office billback for 2014-15 in special education transportation shows that transportation costs should be approximately \$69,500, but the district has budgeted only \$15,000. Although this would indicate a budget shortfall, as noted in Standard 20.1, there is a significant credit due back to the district, which should alleviate the situation. However, the district should align its budget with the billback estimates during its second interim reporting cycle.

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 for these students, it was unable to fill part-time bus driver positions and so continued to contract with the county office to transport special education students.

During this review period, the district changed its bus driver positions back to bus driver/custodian positions and offered bus driver training courses. Consequently, the district's ability to fill bus driver positions has improved and the district is determining if it can provide transportation for all of its special education students in the coming school year. In the interim, the district transports some of its students and continues to contract with the county office to transport those that it cannot accommodate.

3. In prior review periods, the district had a mechanic and some of its maintenance and operations staff perform bus driver duties, but there were concerns about ensuring that they were properly charged to the transportation budget to accurately account for program costs. In accordance with the California Department of Education's (CDE's) directive that only expenditures of carryover balances from 2012-13 should continue to be accounted for using the home-to-school transportation or special education transportation resource code, the district has changed all account lines for transportation expenditures to show the unrestricted 0000 resource for the home-to-school program and resource 6500 for the special education transportation program, both with a function of 3600. The LCFF includes pupil 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 transportation in 2012-13 or the amount of state revenue received in 2013-14, whichever is less. Therefore, the district will need to continue to track pupil transportation expenditures to ensure this requirement is met.
4. Review of the California Highway Patrol's (CHPs) Safety Compliance Report/Terminal Record Update dated January 16, 2014 showed inspection ratings were satisfactory. The CHP Carrier Inspection of the same date also showed a satisfactory rating. CHP Driver/Vehicle Examination Reports dated January 13 and 14, 2014 indicated that of the 12 vehicles inspected, no violations were discovered in nine. The other three had the

following violations: excessive oil and grease on the chassis/engine area, left rear red light inoperative, and/or an air suspension out of service violation.

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 because 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 director of MOTF 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.
7. Continue to comply with maintenance schedules to ensure compliance with CHP inspection standards.

Standard Partially Implemented

February 2010 Initial Rating: 3

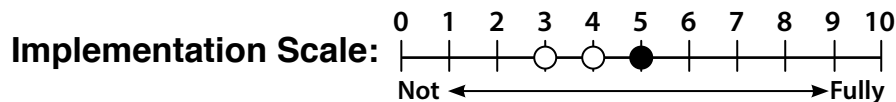
March 2011 Rating: 3

March 2012 Rating: 3

March 2013 Rating: 4

June 2014 Rating: 5

May 2015 Rating: 5



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)

Findings

1. 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. This annual maximum will increase to \$11,000 effective July 1, 2015 and to \$11,750 effective July 1, 2016 under the terms of the district's most recent collective bargaining agreements. Employees select coverage from multiple plans and may elect to pay for additional coverage for dependents.
2. The district's most recent actuarial study for post-employment benefits, dated June 13, 2014 and effective July 1, 2014, was prepared by Total Compensation Systems, Inc. GASB Statement No. 45 rules require a new valuation report every three years if the employer has less than 200 employees. The next actuarial report valuation will need to be prepared before the June 30, 2017 effective date; however, one consideration listed in the actuarial report that could trigger a new valuation is changes to retiree benefit provisions, such as the new annual district contribution maximums noted above.
3. 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 of one 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	\$166,663
Initial UAAL Amortization	\$128,884
Residual UAAL Amortization	(\$17,207)
ARC	\$278,340

4. The district has elected to fund the pay-as-you-go portion at this time because of 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 were estimated to be \$133,236 beginning July 1, 2014 and are projected to increase to \$165,873 by July 1, 2023. According to the pay-as-you-go funding of retiree benefits report, the total amount projected for 2015 is \$132,646. A comparison of the district's budget, encumbrances and actual expenditures through January 6, 2015 with the actuarial study report shows the following:

Year	Actuarial Report Projection	2014-15 Adopted Budget	2014-15 First Interim Budget	2014-15 Encumbered as of 1/6/2015	2014-15 Expended as of 1/6/2015
2015	\$132,646	\$141,661	\$177,455	\$85,854	\$95,051

5. The district has budgeted more than the actuarial report projection, but the actual expenditures plus encumbrances exceed the amount of the 2014-15 first interim budget by approximately \$3,500.

Based on the amounts shown above, actual costs in 2014-15 may exceed the pay-as-you-go funding of retiree benefits shown in the actuarial report. However, it will not exceed the amount of the ARC. This means that the unfunded liability or net OPEB obligation will continue to grow and thereby increase the negative amount shown in the unrestricted portion of net position in the 2013-14 audited financial statements.

6. A review of the board packet from the August 14, 2014 meeting shows that the entire actuarial study for post-employment benefits, dated June 13, 2014 and prepared by Total Compensation Systems, Inc., was presented to the board for its review. Minutes of the August 14, 2014 board meeting indicate that the state administrator spoke regarding providing this report to keep the board apprised of the information, and one board member commented on the report.
7. In May 2013, the district entered into an MOU with its certificated employee bargaining unit that provided three options for an early retirement incentive with an irrevocable letter of retirement on or before noon on May 16, 2013:
 - Option One: For employees who are at least 60 years of age by June 30, 2013, district-paid health and welfare benefits at the same rate as association members until age 65 or the start of Medicare eligibility, plus \$10,000 for the subsequent three years.
 - Option Two: For employees who are at least 57 years of age and have at least 10 years of service in the district by June 30, 2013, the district would provide health and welfare benefits under the same plans as association members at the rate of \$10,000 per year from the start of retirement to age 65 or the start of Medicare eligibility.
 - Option Three: For employees with 10 years of service in the district and who are 65 years of age or older as of June 30, 2013, payment of \$30,000 to be paid at \$10,000 per year for three years.

Two employees accepted option one and one accepted option two of this offer. The district was not able to locate calculations showing the cost or savings associated with this offer.

District administrators reported that another early retirement offer was made to certificated employees for the 2013-14 fiscal year. The offer stated that employees who reached 60 years of age by June 30, 2014 could receive district-paid health and welfare benefits at the same rate as association members until age 65 or time of Medicare eligibility, and:

- For 26 years of service by June 30, 2014, a cash payment of \$35,000 paid in three installments on July 31, 2014, 2015 and 2016
 - For 21-25 years of service by June 30, 2014, a cash payment of \$25,000 paid in three installments on July 31, 2014, 2015 and 2016
 - For 20 years or less of service by June 30, 2014, a cash payment of \$15,000 paid in a lump sum on July 31, 2014
8. Four certificated employees accepted the offer. After including the costs for replacement personnel, contractual health and welfare benefits, and cash incentive as listed above, the district estimated its annual savings at approximately \$48,200.
 9. The audited financial statements for June 30, 2014 do not show a long-term debt obligation for the May 2014 early retirement incentive. These statements show that the district contributed \$126,514 in retiree benefits for other post-employment benefits (OPEB), and the CBO reported that this represents the district-paid premiums for retirees.

Recommendations for Recovery

The district should:

1. Obtain a new actuarial study for OPEB, to be effective June 30, 2017, as required by GASB Statement No. 45.
2. Consider obtaining a new actuarial study effective July 1, 2015 for OPEB because of the newly negotiated maximum district contribution amounts.
3. Continue to monitor, investigate and address the variances between its budgeted amounts and its actual estimated expenditures for retiree benefits.
4. Continue providing the board with the actuarial report showing the actual accrued but unfunded costs of retiree benefits.
5. Include in its fiscal solvency plan methods for fully funding the ARC and reducing the net OPEB obligation.
6. Calculate the total obligation for the 2014 early retirement incentive and include this in its 2014-15 budget, multiyear financial projection and audited financial statements.

Standard Partially Implemented

February 2010 Initial Rating: 4

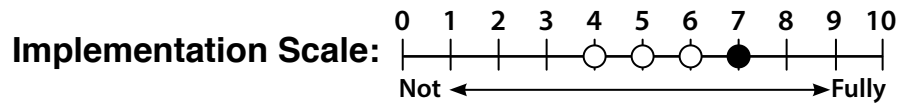
March 2011 Rating: 5

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 5

May 2015 Rating: 7



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.

Findings

1. The workers' compensation joint powers authority (JPA) provides actuarial studies that identify risk exposure and establish a program rate recommendation at 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 district was unable to provide FCMAT with an updated actuarial report of the JPA as a whole since the one issued on May 20, 2010; however, FCMAT was provided with a loss run report as of December 31, 2014 that provides the following information specific to the district:

Total claims	314
Open claims	17
Total paid	\$2,579,009
Total outstanding	\$813,620

A comparison of unaudited actuals for 2013-14 with the 2014-15 first interim budget report indicates that workers' compensation expenditures in all funds are projected to decrease by \$94,070, or 30.37%, because of a 1.1667% reduction in its rates based on its experience level.

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 child abuse, mandatory reporting, diversity awareness, sexual harassment and misconduct, blood-borne pathogens, ethics, and sensitivity awareness. Safety training on topics such as fire extinguisher safety, hand and power tool safety, material safety data sheets, facility emergencies, slips trips and falls, utility cart safety, chemical spills, and chemical storage and handling, 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 by sending an email message that includes a link to the training modules. Upon completion of a module, the test results are sent to the district's human resources office. The district provided FCMAT with a report of employees who still need to complete assignments from their Keenan training; this report shows that 49 employees still need to complete one to four of the modules assigned to them.

3. The district contracts with the Monterey and San Benito Counties Liability and Property JPA for insurance that covers its members' auto and general liability losses up to \$25,000 per property loss and \$50,000 per liability loss. Any loss that exceeds these amounts is covered by the Northern California Regional Liability Excess Fund. The JPA issued an actuarial report dated February 16, 2014, effective June 30, 2014, which was prepared by Bay Actuarial Consultants. The district previously had difficulty obtaining the report, and the last one had been issued in 2010. The district is encouraged to request an updated actuarial report annually from the JPA.

The district pays a premium for its property and liability coverage, and the JPA determines the liability that is required to be recognized in its financial statements and adjusts the premium for the experience of the JPA member. This calculation establishes the JPA's contributions/premiums for each of its members. The district's premium therefore covers its risk in the areas of property and liability coverage.

The report stated that 2011-12 was "the worst year that the Authority had ever experienced," with adjusted claims at \$787,000. Estimated losses for 2012-13 are projected to be \$681,000. Based on the annual program average of \$364,000 for the preceding eight years and on current claims data, the report speculates that this was a "streak of bad luck" and that the high level of losses "will not continue forever."

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 the policy, but the district is not in compliance in this area. Specifically, Administrative Regulation 3514.1 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 Title 8 Section 5164 and Education Code Section 49411.
5. The July 22, 2013 hazardous materials survey and inventory of hazardous materials report prepared by Keenan & Associates cites hazardous conditions in 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, FCMAT 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; this checklist was blank. As was the case in the prior report, the district was unable to provide documents showing compliance with 19 findings in the report.

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 CBO attends these meetings when possible.

6. On April 1, 2014, Keenan & Associates issued a property and liability inspection follow-up report based on a physical inspection conducted on February 27, 2013. The February 2013 inspection was conducted in accordance with the Northern California Regional Liability Excess Fund (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 thus reduce the frequency and severity of possible property and liability losses. The follow-up report discusses the progress, or lack thereof, in addressing the eight priority recommendations identified in the inspection report.

The Keenan & Associates inspection 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. Encourage its CBO to attend JPA meetings.
4. 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.
5. Contact the Monterey and San Benito Counties Liability and Property JPA to determine when the next actuarial report will be issued and request a copy to be forwarded to the district.
6. Immediately correct all high-priority conditions identified in the property and liability report prepared by Keenan & Associates.

Standard Partially Implemented

February 2010 Initial Rating: 2

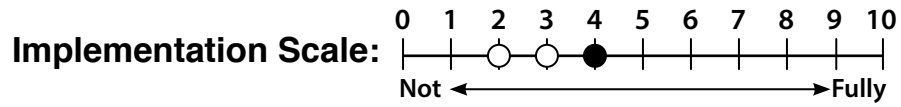
March 2011 Rating: 3

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 2

May 2015 Rating: 4



Appendix A

Positions Interviewed

1. State administrator
2. Board members
3. Chief business official
4. Payroll/benefits technician
5. Business technician
6. Senior director of human resources
7. Director of MOTF
8. MOTF technician
9. Director of educational services
10. CSEA chapter president
11. CTA chapter vice president
12. Receptionist/human resources assistant
13. Executive assistant
14. Senior director of information technology
15. Technology assistant
16. Technology technician
17. Data system analyst
18. School principals
19. School clerical staff (including attendance clerks, school secretaries, and registrar/truancy/ASB clerks)
20. ASB advisors
21. School site council representatives, King City High School

22. Monterey County Office of Education superintendent, associate superintendent for business services, and finance and business services staff

Appendix B

Source Documents

1. Board meeting agendas, packets and minutes
2. Board policies and administrative regulations
3. Board policy index
4. District website
5. State administrator's blog
6. Friday Updates
7. Business office meeting agendas and minutes
8. Administrative council agendas
9. Annual audit reports: 2011-12, 2012-13 and 2013-14
10. Second interim report, 2013-14
11. Unaudited actuals report, 2013-14
12. Adoption budget report, 2014-15
13. First interim report, 2014-15
14. District organizational chart, December 15, 2014
15. Business services organizational chart, December 30, 2014
16. Education Audit Appeals Panel Decision, July 28, 2014
17. Bank statements and reconciliations: September, October and November 2014
18. Monthly payroll reconciliation forms and payroll reports for November and December 2014
19. Debt service schedule for state loan
20. Monterey County Office of Education budget review letters for 2013-14 second interim report and 2014-15 adopted budget
21. Master inventory reports, December 23, 2014 and January 30, 2015

22. Dynamic asset computer inventory, January 30, 2015
23. Various financial system budget reports: 2011-12, 2012-13, 2013-14 and 2014-15
24. Special education maintenance of effort reports, 2013-14 unaudited actuals and 2014-15 first interim
25. Special education billback 2013-14 - final, September 4, 2014
26. Monterey County Office of Education special education billback 2014-15, January 6, 2015
27. 2014-15 SELPA local assistance distribution (resource 3310), June 13, 2014
28. 2014-15 SELPA AB-602 distribution to districts (resource 6500), June 13, 2014
29. LCFF calculations, 2013-14 and 2014-15
30. P-2 and annual attendance reports, 2013-14
31. P-1 attendance report, 2014-15
32. Collective bargaining agreement with CSEA, July 1, 2013 to June 30, 2016
33. Collective bargaining agreement with KCJUHSD Teachers' Association, July 1, 2013 to June 30, 2014
34. Draft multiyear financial recovery plan 2012-13 to 2017-18, March 2013
35. Employee handbook, August 2014
36. Required annual notices, August 27, 2014
37. Matrix of CSBA Masters in Governance module completion, March 2014
38. Statements of Economic Interests Form 700, 2013-14
39. Budget calendar
40. LCAP committee meeting sign-in sheets, February 26 and March 26, 2014
41. Monthly budget reports presented to the board
42. Monthly cash flow reports presented to the board
43. Revenue and expenditure reports presented to the board

44. Categorical program funds spreadsheets, October 27, 2014
45. Position control reports, 2014-15
46. CALPADS 1.17 report, 2014-15
47. Daily attendance report by month, 2014-15 months 1 through 4 for comprehensive high schools
48. Gain and loss reports, samples from all schools
49. Independent study monthly reports, samples from all schools
50. Attendance instructions to staff for leave categories
51. Tentative monthly ADA schedule, 2014-15
52. Grading schedule, 2014-15
53. Aeries support team training schedule, 2014-15
54. Aeries support team sign-in sheets and agenda, January 21, 2015
55. Tasks for attendance listing showing daily, weekly and monthly reports to run
56. Sample truancy letters
57. Attendance/truancy parent meeting sign-in sheets
58. List of students on warning, comprehensive high schools
59. List of truancy letters
60. Attendance Procedures Manual
61. ASB documentation, procedures and instructions, August 7, 2014
62. List of ASB roles and responsibilities of district and school personnel
63. Technology work orders, July 24, 2014 through December 22, 2014
64. Emails from senior director of information technology regarding data center environment
65. SMCJUHSD Technology Policies & Procedures Manual
66. SMCJUHSD Technology Plan, 2013-2016

67. CALPADS procedure manual
68. Direct certification procedures documentation
69. Data center environmental monitoring device specifications
70. Data center environmental monitoring device installation and monitoring quote
71. List of training provided by chief business official, 2013-14 and 2014-15
72. Website cafeteria menus, January and February 2015
73. SMCJUHSD food service daily sales data, August 11, 2014 through February 4, 2015
74. CHP Safety Compliance Report/Terminal Record Update, January 16, 2014
75. CHP Carrier Inspection, January 16, 2014
76. CHP driver/vehicle examination reports, January 13 and 14, 2014
77. Total Compensation Systems, Inc. actuarial study of retiree health liabilities as of July 1, 2014, dated June 13, 2014
78. Memorandum of Understanding Between the King City Joint Union High School District Teachers Association and the South Monterey County Joint Union High School District for the 2012-13 Academic year only, May 7, 2013
79. Memorandum of Understanding Between the King City Joint Union High School District Teachers Association and the South Monterey County Joint Union High School District, May 28, 2014
80. CTA retirement incentive worksheet, May 21, 2014
81. South Monterey County Joint High School District workers' compensation loss run report, December 31, 2014
82. Bay Actuarial Consultants *Actuarial Review of the Property & Liability Program of the Monterey & San Benito Counties Liability & Property Joint Powers Authority*, February 16, 2014
83. Keenan and Associates property and liability follow-up report, April 1, 2014
84. Keenan SafeSchools training course completions report, February 2, 2015
85. Keenan SafeSchools training course compliance report, employees with outstanding assignments, February 20, 2015

Table of Financial Management Ratings

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 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	6
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	7
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	5

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
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	6
3.1	<p>PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT</p> <p>The LEA has developed and uses a professional development plan for training business staff. The plan includes the input of business office supervisors and managers, and identifies appropriate training programs. Each staff member and management employee has a plan designed to meet their individual professional development needs.</p>	1	1	1	1	4	5
3.2	<p>PROFESSIONAL STANDARD – STAFF PROFESSIONAL DEVELOPMENT</p> <p>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

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
5.1	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The Governing Board focuses on expenditure standards and formulas that meet the goals and maintain the LEA's financial solvency for the current and two subsequent fiscal years. The Governing Board avoids specific line-item focus, but directs staff to design an entire expenditure plan focusing on student and LEA needs.	2	4	4	4	3	6
5.2	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The budget development process includes input from staff, administrators, board and community as well as a budget advisory committee.	3	3	3	3	4	5
5.3	PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS The LEA has clear policies and processes to analyze resources and allocations to ensure that they align with strategic planning objectives and that the budget reflects the LEA's priorities. The budget office has a technical process to build the preliminary budget that includes revenue and expenditure projections, the identification of carryovers and accruals, and any plans for expenditure reductions. A budget calendar contains statutory due dates and major budget development milestones.	2	3	3	3	4	6

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
5.4	<p>PROFESSIONAL STANDARD – BUDGET DEVELOPMENT PROCESS</p> <p>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.</p> <p>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	5
6.1	<p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>The LEA adopts its annual budget within the statutory timelines established by EC 42103, which requires that on or before July 1, the 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	10
6.2	<p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>Revisions to expenditures based on the state budget are considered and adopted by the governing board. Not later than 45 days after the governor signs the annual Budget Act, the LEA shall make available for public review any revisions in revenues and expenditures that it has made to its budget to reflect funding available by that Budget Act. (EC 42127(2) and 42127(i)(4))</p>	2	6	8	5	7	9

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
6.3	<p>LEGAL STANDARD – BUDGET ADOPTION, REPORTING, AND AUDITS</p> <p>The LEA completes and files its interim budget reports within the statutory deadlines established by EC 42130, et. seq. All reports are in a format or on forms prescribed by the Superintendent of Public Instruction and are based on standards and criteria for fiscal stability.</p>	3	6	6	6	7	8
7.2	<p>PROFESSIONAL STANDARD – BUDGET MONITORING</p> <p>The LEA implements budget monitoring controls, such as periodic budget reports, to alert department and site managers of the potential for overexpenditure of budgeted amounts. Revenue and expenditures are forecast and verified monthly. The LEA ensures that appropriate expenditures are charged against programs within the spending limitations authorized by the Governing Board.</p>	2	3	3	3	4	6
7.3	<p>PROFESSIONAL STANDARD – BUDGET MONITORING</p> <p>The LEA uses an effective position control system that tracks personnel allocations and expenditures. The position control system establishes checks and balances between personnel decisions and budgeted appropriations.</p>	1	4	5	5	7	8
8.1	<p>PROFESSIONAL STANDARD – ACCOUNTING</p> <p>The LEA forecasts its cash receipts and disbursements and verifies those projections monthly to adequately manage its cash. The LEA reconciles its cash to bank statements and reports from the county treasurer monthly.</p>	1	2	3	3	5	6

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
8.2	PROFESSIONAL STANDARD – ACCOUNTING The LEA's payroll procedures comply with the requirements established by the county office of education, unless the LEA is fiscally independent. (EC 42646) Per standard accounting practice, the LEA implements procedures to ensure timely and accurate payroll processing.	2	4	3	3	4	7
9.2	PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING School sites maintain an accurate record of daily enrollment and attendance that is reconciled monthly. School sites maintain statewide student identifiers and reconcile data required for state and federal reporting.	3	4	4	4	5	6
9.3	PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Policies and regulations exist for independent study, charter, home study, inter-/intra-LEA agreements, LEAs of choice, and ROC/P and adult education, and address fiscal impact.	1	1	2	2	5	6
9.4	PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING Students are enrolled and entered into the attendance system in an efficient, accurate and timely manner.	3	4	4	4	5	6
9.6	PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING The LEA utilizes standardized and mandatory programs to improve the attendance rate of pupils. Absences are aggressively followed up by LEA staff.	1	6	7	7	6	6
9.7	PROFESSIONAL STANDARD – ATTENDANCE ACCOUNTING School site personnel receive periodic and timely training on the LEA's attendance procedures, system procedures and changes in laws and regulations.	1	5	5	6	7	7

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
10.4	<p>PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING</p> <p>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	4
10.5	<p>PROFESSIONAL STANDARD – ACCOUNTING, PURCHASING, AND WAREHOUSING</p> <p>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	4
11.1	<p>LEGAL STANDARD – STUDENT BODY FUNDS</p> <p>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	5

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
11.3	<p>LEGAL STANDARD – STUDENT BODY FUNDS</p> <p>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	4
12.1	<p>LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS</p> <p>The LEA provides a multiyear financial projection for at least the general fund at a minimum, consistent with the policy of the county office. Projections are done for the general fund at the time of budget adoption and all interim reports. Projected fund balance reserves are disclosed and assumptions used in developing multiyear projections that are based on the most accurate information available. The assumptions for revenues and expenditures are reasonable and supported by documentation. (EC 42131)</p>	1	3	4	4	5	6
12.2	<p>LEGAL STANDARD – MULTIYEAR FINANCIAL PROJECTIONS</p> <p>The Governing Board ensures that any guideline developed for collective bargaining fiscally aligns with the LEA's multiyear instructional and fiscal goals. Multiyear financial projections are prepared for use in decision-making, especially whenever a significant multiyear expenditure commitment is contemplated, including salary or employee benefit enhancements negotiated through the collective bargaining process. (EC 42142)</p>	1	4	4	4	5	6

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
14.1	LEGAL STANDARD – IMPACT OF COLLECTIVE BARGAINING Public disclosure requirements are met, including the costs associated with a tentative collective bargaining agreement before it becomes binding on the LEA or county office of education. (GC 3547.5 (b)).	1	4	3	2	3	5
14.2	LEGAL STANDARD – IMPACT OF COLLECTIVE BARGAINING Bargaining proposals and negotiated settlements are “sunshined” in accordance with the law to allow public input and understanding of employee cost implications and, most importantly, the effects on the LEA’s students. (Government Code 3547, 3547.5)	1	4	4	3	4	5
14.3	PROFESSIONAL STANDARD – IMPACT OF COLLECTIVE BARGAINING The LEA has developed parameters and guidelines for collective bargaining that ensure that the collective bargaining agreement does not impede the efficiency of LEA operations. Management analyzes the collective bargaining agreements to identify any characteristics that impede effective delivery of LEA services. The LEA identifies those issues for consideration by the Governing Board. The Governing Board, in developing its guidelines for collective bargaining, considers the impact on LEA operations of current collective bargaining language, and proposes amendments to LEA language as appropriate to ensure effective and efficient service delivery. Governing Board parameters are provided in a confidential environment, reflective of the obligations of a closed executive board session.	2	6	6	7	8	9

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
15.2	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Management information systems support users with information that is relevant, timely, and accurate. Assessments are performed to ensure that users are involved in defining needs, developing specifications, and selecting appropriate systems. LEA standards are imposed to ensure the maintainability, compatibility, and supportability of the various systems. The LEA ensures that all systems are SACS-compliant, and are compatible with county systems with which they must interface.</p>	3	4	5	6	7	7
15.3	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Automated systems are used to improve accuracy, timeliness, and efficiency of financial and reporting systems. Needs assessments are performed to determine what systems are candidates for automation, whether standard hardware and software systems are available to meet the need, and whether or not the LEA would benefit. Automated financial systems provide accurate, timely, relevant information and conform to all accounting standards. The systems are designed to serve all of the various users inside and outside the LEA. Employees receive appropriate training and supervision in system operation. Appropriate internal controls are instituted and reviewed periodically.</p>	0	1	1	1	4	6

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
15.7	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>Hardware and software purchases conform to existing technology standards. Standards for network equipment, servers, computers, copiers, printers, fax machines, and all other technology assets are defined and enforced to increase standardization and decrease support costs. Requisitions that contain hardware or software items are forwarded to the technology department for approval before being converted to purchase orders. Requisitions for nonstandard technology items are approved by the information management and technology department(s) unless the user is informed that LEA support for nonstandard items will not be available.</p>	0	0	2	4	6	6
15.8	<p>PROFESSIONAL STANDARD – MANAGEMENT INFORMATION SYSTEMS</p> <p>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	6
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	4

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
17.1	PROFESSIONAL STANDARD – FOOD SERVICE FISCAL CONTROLS To accurately record transactions and ensure the accuracy of financial statements for the cafeteria fund in accordance with GAAP, the LEA has purchasing and warehousing procedures to ensure that these requirements are met.	5	0	1	1	6	7
20.1	PROFESSIONAL STANDARD – SPECIAL EDUCATION The LEA actively takes measures to contain the cost of special education services while providing an appropriate level of quality instructional and pupil services to special education students. The LEA meets the criteria for the maintenance of effort requirement.	1	3	4	4	4	5
21.1	PROFESSIONAL STANDARD – TRANSPORTATION The LEA actively takes measures to control the cost of transportation services and limit the contribution from the general fund while providing safe and reliable transportation to the students.	3	3	3	4	5	5
22.1	LEGAL STANDARD – RISK MANAGEMENT – OTHER POST EMPLOYMENT BENEFITS LEAs that provide health and welfare benefits for employees upon their retirement, and those benefits will continue past the age of 65, shall provide the board an annual report of actual accrued but unfunded costs of those benefits. An actuarial report should be performed every three years. (EC 41240)	4	5	6	6	5	7

Financial Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
22.2	<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	4
Collective Average Rating		1.54	2.93	3.39	3.54	4.76	6.0

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 Sixth Comprehensive Review, May 2015

The district continues to show evidence of emergency preparedness training and updating of its emergency preparedness plan.

Findings

1. King City High School and Greenfield High School held staff meetings to discuss their school site safety plans.
2. King City High School and Greenfield High School site councils held staff meetings to review and discuss their comprehensive emergency preparedness plans. Evacuation plans were posted on each school's multipurpose room wall.
3. FCMAT interviewed both high school principals, and both demonstrated knowledge of the district's board policies, administrative regulations and site evacuation plans. The state administrator developed and maintained 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.
4. The district's emergency preparedness plan was updated in July 2014. The plan includes all elements identified in the updated board policy.
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. King City and Greenfield high schools both conducted emergency preparedness drills at each school.

Recommendations for Recovery

The district should:

1. Continue to update its emergency preparedness plan annually, following Board Policy and Administrative Regulation 3516, and ensure that the information included is updated 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. Continue to maintain an up-to-date emergency preparedness plan that is specific to each 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

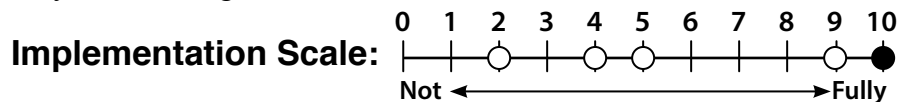
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 9

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The district has developed a comprehensive districtwide safety plan. The district has implemented school site safety committees, 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. The district has implemented school site safety committees at King City High School and Greenfield High School. The committees have met twice in the current school year and are scheduled to meet quarterly to review and update school site safety plans.
2. Board Policy and Administrative Regulation 0450, regarding a comprehensive school safety plan, were adopted in June of 2012.
3. 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.
4. 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.
5. Employees have received training in hazardous chemical safety, fire extinguisher safety and forklift safety. Employees are also receiving electrical safety, ladder safety, and material safety data sheet (MSDS) training as part of the online training provided through the human resources department.

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. Maintain the site safety committees and ensure that they meet regularly to review and communicate school safety issues and update their site safety plan as needed.
3. Establish a districtwide safety committee to help develop and support safety plans.

Standard Fully Implemented

February 2010 Initial Rating: 4

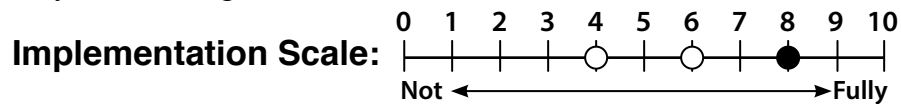
March 2011 Rating: 4

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 6

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

FCMAT 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 and grounds personnel are in daily contact with the maintenance, operations, transportation and facilities (MOTF) director and site principal.

Findings

1. The district has returned supervision of site maintenance and grounds personnel from the site principals to the MOTF director.
2. The MOTF director is responsible for developing all work assignments and work schedules for personnel at the school sites. However, because of the limited number of staff, MOTF personnel are sometimes redirected from their regular routine depending upon daily needs and circumstances. Additional duties for the grounds keeping personnel such as occasional bus driving responsibilities each week should be evaluated to ensure that these personnel are scheduled for sufficient time at each site to maintain the grounds.
3. During FCMAT's site visits, King City High School and Greenfield high schools appeared to be generally clean and free of debris. All areas of both campuses, including but not limited to play fields and perimeter fencing, are in satisfactory condition.
4. Facility issues identified on the Williams Facilities Inspection Tool (FIT) continue to be corrected regularly.
5. The first quarterly FIT reports, dated April 2014 by Facilities Inspection Services, rated both Greenfield High School and King City High School as in good repair with no items in need of emergency attention.
6. The MOTF director conducts weekly walk-through site visits.

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 MOTF director 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 occasional bus driving responsibilities, to offset the loss of staff productivity.
4. Consider hiring additional maintenance and groundskeeping staff as funding becomes available.

Standard Fully Implemented

February 2010 Initial Rating: 3

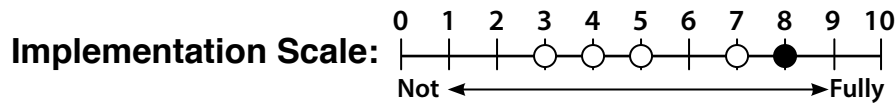
March 2011 Rating: 4

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8



1.9 School Safety

Legal Standard

The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)

Summary of Sixth Comprehensive Review, May 2015

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. The IIPP was updated In January 2015,

Findings

1. Training verification forms have been completed that acknowledge 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. It would benefit the district to consider developing 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 was inspected by Facilities Inspection Services as part of its required Williams inspection of facilities to identify unsafe conditions. No unsafe conditions were indicated in the April 2014 report.
4. The district's facilities are inspected once per year by Keenan and Associates as part of the Monterey County Schools Insurance Group Joint Powers Authority (JPA) annual inspection process to identify any existing safety or hazardous conditions, An annual report Is prepared for the district on the identified hazards, and a subsequent report is prepared on the progress made correcting issues identified in the previous year's report.
5. Keenan and Associates is scheduled to complete their annual safety and hazardous conditions inspection of the district on April 2, 2015. The inspection identifies any potential safety risks and 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 MOTF director to conduct a comprehensive school safety inspection at least twice per year. The site administrator or assistant principal should participate in these inspections.

Standard Fully Implemented

February 2010 Initial Rating: 0

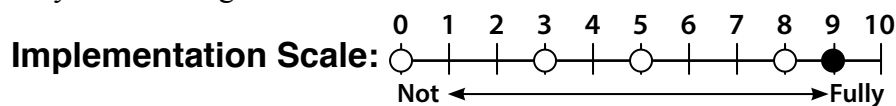
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 5

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

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 and Greenfield high schools included updates for the 2014-15 school year.
4. The district is inspected each year for MSDS compliance and hazardous materials inventory by its JPA, which uses Keenan and Associates. This year's inspection is scheduled for May 4, 2015.

Recommendations for Recovery

The district should:

1. Continue to regularly audit materials storage areas, custodial rooms, 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

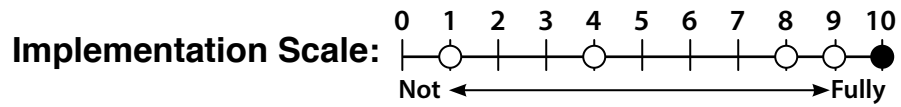
March 2011 Rating: 4

March 2012 Rating: 8

March 2013 Rating: 9

June 2014 Rating: 10

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The district implemented key control procedures and updated its board policy in this area. The district continues to use its key control procedures effectively.

Findings

1. The MOTF department continues to maintain the key issuance maintenance log.
2. The MOTF director continues to provide oversight for the district's key issuance policy and procedures. Site administrators continue to maintain key control procedures at school sites with no issues of unauthorized facility use.

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

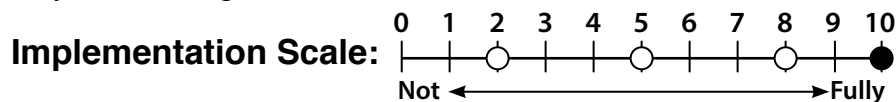
March 2011 Rating: 5

March 2012 Rating: 8

March 2013 Rating: 8

June 2014 Rating: 10

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

The outside lighting at both high school campuses is satisfactory.

Findings

1. The FIT evaluation conducted by Facilities Inspection Services in April 2014 indicated that the exterior lighting outside three classrooms at Greenfield High was not working.
2. The MOTF director meets weekly with the administrative and custodial staff of each campus to review and discuss the facility needs of each campus.
3. The district's 2013-14 and 2014-15 general fund budgets allocate \$350,000 for preventive maintenance and other facilities projects and include the possible replacement of lighting fixtures.

Recommendations for Recovery

The district should:

1. Continue to review and develop additional plans to maintain and repair campus lighting as needed.
2. Consider using Proposition 39 funds to make any identified lighting improvement and improve efficiency.

Standard Fully Implemented

February 2010 Initial Rating: 1

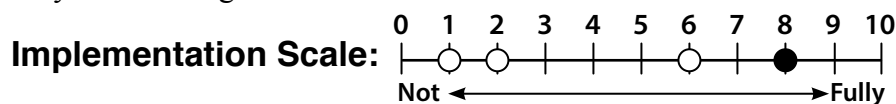
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 6

June 2014 Rating: 8

May 2015 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 Sixth Comprehensive Review, May 2015

The district has developed comprehensive districtwide safety plans that include disaster preparedness and injury and illness prevention plans (IIPPs), and has continued to review, update, and communicate the plan throughout the district. The district has provided various online safety trainings for employees, coordinated 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 has continued to meet the requirements of this policy.
3. The district does not have a districtwide safety committee to help develop and maintain its comprehensive school safety program.
4. Board Policy 3516, regarding an emergency 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 MOTF director to be responsible for the formation of a comprehensive employee safety program and committee in accordance with Board Policy 0450.
2. Schedule comprehensive school safety inspections at least two times per year with each site administrator.

Standard Fully Implemented

February 2010 Initial Rating: 0

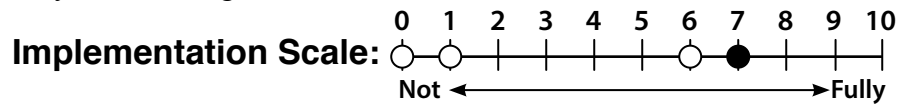
March 2011 Rating: 1

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 6

May 2015 Rating: 7



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.

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

May 2015 Rating: N/A

Implementation Scale: 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 Sixth Comprehensive Review, May 2015

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 had signed a service agreement with NTD Architecture for facility-related projects, but the firm is no longer in business. In November 2014 the district signed an agreement with JK Architects for completion of various facilities-related projects at each of its school sites. The architectural firm was selected after following the process outlined in board policy.

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

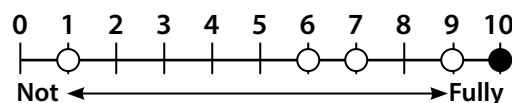
March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 9

May 2015 Rating: 10

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 Sixth Comprehensive Review, May 2015

The district's long-range school facilities master plan was adopted in February 2011. The district's 2014-15 budget includes plans for facilities improvement projects. New residential units are being built in the district, which may change the School Facilities Master Plan's current assumptions.

Findings

1. The district has a long-range school facilities master plan completed by TSS consultants in February 2011 but has not updated its the plan since that time.
2. In each of last two fiscal years the district has included facilities improvement in its general fund budget, including \$350,000 for preventive maintenance projects.
3. New homes are being built in the district, which may change the current assumptions of the district's School Facilities Master Plan.
4. The Office of Public School Construction's (OPSC's) Emergency Repair Program (ERP) provides grant and/or reimbursement funding to local educational agencies (LEAs) for the cost of repairing or replacing existing buildings or structural components that are broken or not functioning properly and that pose a health and safety threat to students and staff at eligible school sites.

As of February 24, 2015, the State Allocation Board apportioned \$530.8 million for funded projects and approved \$266.1 million for unfunded projects. The OPSC ERP Workload List shows that the South Monterey Joint Union High School District (formerly King City Joint Union High School District) will receive funding in the 2014-15 or 2015-16 fiscal year. The district is among those districts with projects on the approved but unfunded list. The district can anticipate receipt of \$1,888,121 in emergency repair funds for King City High School and \$78,696 for Greenfield High School.

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 2013-14 fiscal year at King City High School, and to reassess the impact of potential student growth due to new homes being built in the district.

2. Continue to regularly review the master plan to ensure its accuracy and to identify or add new projects and their costs.
3. Continue to budget capital improvement funds in its annual budget to complete projects identified in the facilities master plan.
4. Review the district's applications for the Emergency Repair Program submitted in June 2008 and included in the district's School Facilities Master Plan.

Standard Fully Implemented

February 2010 Initial Rating: 0

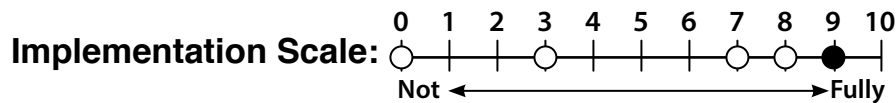
March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9

May 2015 Rating: 9



2.8 Facility Planning

Professional Standard

The LEA has a facility planning committee.

Summary of Sixth Comprehensive Review, May 2015

The district's facility planning committee continues to meet quarterly to review current and future building or facility improvement needs. The district has allocated \$350,000 for preventive maintenance in each of the past two fiscal years, which was reviewed and approved by the committee.

Findings

1. The district's facilities planning committee has continued to meet regularly since the last review by FCMAT. They have met twice since the beginning of the fiscal year: in November 2014, and in January 2015.
2. Committee members include one board member, the state administrator, two assistant principals, four community members, the chief business official, and the MOTF director.
3. The committee has identified, and recommended for funding, maintenance and capital improvement projects at each of the district's schools.

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

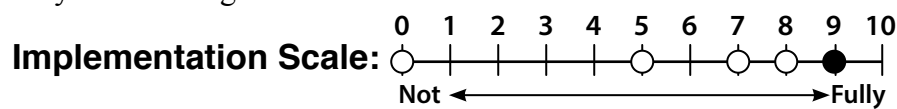
March 2011 Rating: 0

March 2012 Rating: 5

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



3.1 Facilities Improvement and Modernization

Legal Standard

The LEA maintains a plan for maintaining and modernizing its facilities. (EC 17366)

Summary of Sixth Comprehensive Review, May 2015

The district has developed and budgeted for its preventive maintenance plan in both the 2013-14 and 2014-15 fiscal years. The district maintains a school facility planning committee consisting of school employees, administrators, and community members.

Findings

1. The district has developed a preventive maintenance plan that was implemented in fiscal year 2013-14 and included \$350,000 per year in budgeted funding in the 2013-14 and 2014-15 fiscal years.
2. The district maintains a school facility planning committee consisting of school employees, administrators, and community members. The committee reviews site needs and makes recommendations for facility improvement and maintenance project priorities and funding.
3. The Office of Public School Construction website indicates that the 2014-15 state budget includes the funding of all projects on the Emergency Repair Programs unfunded project list, on which the district is identified as having two approved projects. The district can plan for the receipt of \$1,888,121 in emergency repair funds for King City High School and \$78,696 for Greenfield High School.

Recommendations for Recovery

The district should:

1. Although it is no longer legally required, continue to update its five-year deferred or preventive maintenance plan to evaluate and determine current facility needs.
2. Continue to use the school facility planning committee process to determine and prioritize school site facility needs and projects.
3. Review its approved Emergency Repair Program applications to incorporate this funding with preventive maintenance projects funding when it becomes available in 2014-15 or 2015-16.

Standard Fully Implemented

February 2010 Initial Rating: 1

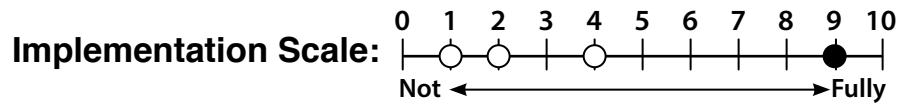
March 2011 Rating: 2

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 9

May 2015 Rating: 9



3.3 Facilities Improvement and Modernization

Legal Standard

All relocatable buildings in use meet statutory requirements. (EC 17292)

Summary of Sixth Comprehensive Review, May 2015

The district's architect completed a building inventory and did not identify any nonconforming buildings. The district has entered into an agreement with an architect to begin planning to remove some nonconforming relocatable buildings.

Findings

1. In 2014 the district's previous architect, NTD Architecture, completed a building inventory and did not identify any nonconforming buildings under Education Code section 17292.
2. In November 2014 the district in signed an agreement with JK Architects to begin demolishing and removing its old district administration building, which is a non-conforming relocatable structure.
3. 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.
4. The district procured an architectural firm to develop the 1-A or 3-A documentation needed to pursue and obtain state approval for any relocatable buildings that do not meet statutory requirements.
5. The architect contracted by the district has closed out all Division of the State Architect (DSA) files (nine total) without DSA certification because of incomplete paperwork. Only one building remains in question.
6. The district still has no permanent toilet facilities at the Greenfield High School stadium.

Recommendations for Recovery

The district should:

1. Finish identifying and obtaining approval for all of its relocatable buildings.
2. Continue to 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 Fully Implemented

February 2010 Initial Rating: 0

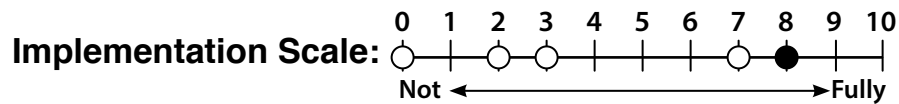
March 2011 Rating: 0

March 2012 Rating: 2

March 2013 Rating: 3

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

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 annually to fund projects listed in its preventive 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 the Emergency Repair Program (ERP).

Standard Fully Implemented

February 2010 Initial Rating: 5

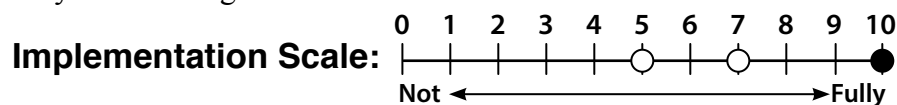
March 2011 Rating: 5

March 2012 Rating: 7

March 2013 Rating: 7

June 2014 Rating: 10

May 2015 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 Sixth Comprehensive Review, May 2015

The district hired a new MOTF director who had not worked in public schools before but who has gained significant knowledge. The chief business official (CBO) is also knowledgeable regarding building programs, OPSC funding, and DSA requirements.

Findings

1. In September 2014 the district hired a new MOTF director. Although the new director had experience in building maintenance, she had not worked in a public school setting; however, she has already acquired significant knowledge regarding OPSC and DSA processes and procedures. She has attended facilities training seminars offered through the Coalition for Adequate School Housing (CASH) and plans to attend the CASH leadership academy in the spring.
2. The district contracted with JK Architects to help perform services needed for OPSC and DSA programs and to help administer its facility improvement projects, new construction, and other state-funded facility projects.

Recommendation for Recovery

The district should:

1. Continue to have the MOTF director and CBO attend training and workshops provided by OPSC and CASH, and regularly review DSA requirements with the district's architect.

Standard Fully Implemented

February 2010 Initial Rating: 0

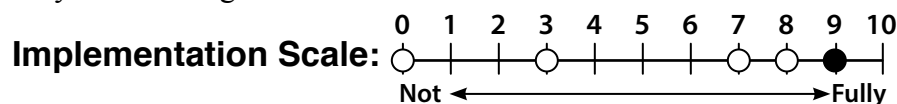
March 2011 Rating: 3

March 2012 Rating: 7

March 2013 Rating: 8

June 2014 Rating: 9

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district signed an agreement with JK Architects to provide construction administration for all current facilities projects. The district has increased work hours of the MOTF technician, which has allowed for more effective management by the MOTF director. The CBO and the MOTF director have knowledge and training in the management of school facilities projects.

Findings

1. The district signed an agreement with JK Architects to provide construction administration for all current facilities projects and plans to complete six facilities improvement projects using JK Architects during the 2014-15 and 2015-16 school years.
2. The district has increased the working hours of the technician position in the MOTF department to 36 hours per week, which has increased the amount of time the MOTF director is available to help manage and administer construction, preventative maintenance, and ongoing maintenance projects.
3. The district has provided the MOTF director with school construction project training through various organizations such as CASBO and CASH. The CBO is also knowledgeable and has training in managing school facilities projects.

Recommendations for Recovery

The district should:

1. Continue to use an outside firm for construction administration and management on facility projects as needed to ensure proper oversight and expertise.
2. Continue to provide training for the MOTF director to strengthen her knowledge and expertise in school construction and to help ensure effective management of construction projects.

Standard Fully Implemented

February 2010 Initial Rating: 0

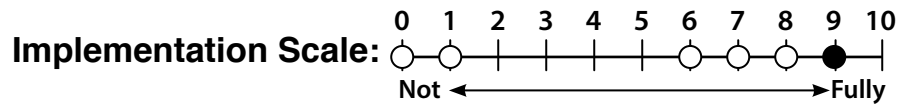
March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



4.2 Construction of Projects

Professional Standard

The LEA maintains appropriate project records and drawings.

Summary of Sixth Comprehensive Review, May 2015

The district maintains all project records and as-built drawings.

Findings

1. The district has located as-built drawings and records related to its building projects.
2. The district has organized its building and facilities project records.
3. The district has begun the process of digitizing all architectural drawings.

Recommendations for Recovery

The district should:

1. Continue to maintain and organize all of its building project records as needed.
2. Require that all contractors and design professionals involved in construction projects provide the district with a full set of digitized plans and records pertaining to the project.

Standard Fully Implemented

February 2010 Initial Rating: 2

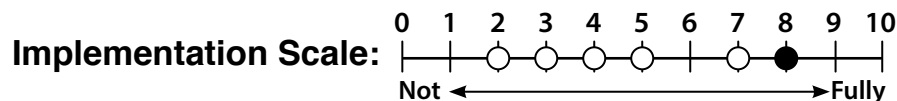
March 2011 Rating: 3

March 2012 Rating: 5

March 2013 Rating: 4

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

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 has developed an inventory and replacement schedule for vehicles used by maintenance and grounds personnel.

Findings

1. The MOTF director 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, such as a lift to reach parking lot lights, a gas leak detector, or other such equipment.
2. The district has developed a complete inventory of capital equipment that includes each vehicle used by maintenance and groundskeeping personnel.
3. The district increased the MOTF technician position's hours to approximately 36 hours per week. This position is responsible for maintaining inventory and maintenance files and records.
4. The MOTF technician updates the district's equipment inventory regularly.

Recommendations for Recovery

The district should:

1. Continue to update and maintain its fixed asset and equipment inventory annually.
2. Update its fixed asset and equipment inventory whenever assets are purchased or disposed of.
3. 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

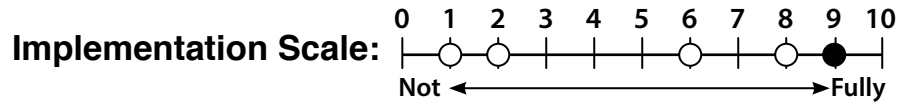
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 6

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

Employee 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 2013-14 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 principals. The school principals work closely with the MOT supervisor on the evaluations of the custodians and groundskeeping staff at their respective schools.

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

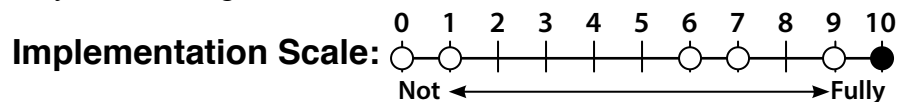
March 2011 Rating: 1

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 9

May 2015 Rating: 10



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 Sixth Comprehensive Review, May 2015

Supervision of custodial and grounds workers has been returned to the MOTF director. The district continues to use work standards and comprehensive work schedules for its maintenance and grounds worker positions.

Findings

1. The district continues to use the work standards developed for maintenance and grounds worker positions.
2. The school principals no longer have the authority to modify the work schedules developed by the MOTF director. The MOTF director is directly responsible for maintenance and grounds workers' daily schedules and routines.

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 any permanent changes to their job duties. Meet with local representatives of the California School Employees Association (CSEA) to accomplish this.

Standard Fully Implemented

February 2010 Initial Rating: 2

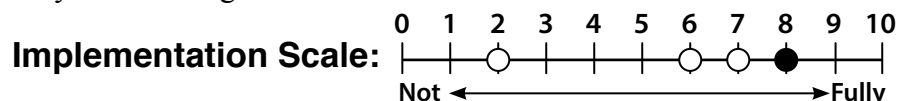
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The district has a written five-year preventive and deferred maintenance plan and has updated its schedule for repairing or replacing vehicles and equipment. The district has implemented the School Dude maintenance work order software system.

Findings

1. The district has developed and implemented a comprehensive preventive maintenance plan. The preventive maintenance plan and deferred maintenance plan were combined in one document to serve both deferred and general maintenance planning needs.
2. The district has updated its schedule for repairing or replacing vehicles and equipment.
3. The district has implemented School Dude maintenance software to monitor, track and record work orders. The software has improved department efficiency.
4. The district allocated \$350,000 for preventative maintenance projects in fiscal year 2013-14 and spent \$97,420. The remaining \$252,980 has been carried over for expenditures in the current fiscal year, along with an additional allocation of \$350,000. At the time of FCMAT's visit, the district had spent approximately \$200,000 of the current fiscal year's budget for preventive maintenance.
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.
7. The district is expected to receive \$1,966,817 in ERP funding from the state for improvements at King City and Greenfield high schools in 2014-15 or 2015-16.

Recommendation for Recovery

The district should:

1. Continue to update and maintain a comprehensive and proactive preventive maintenance plan that includes funding, service intervals, long-term repairs, replacement, and new funding sources such as the ERP.

Standard Fully Implemented

February 2010 Initial Rating: 0

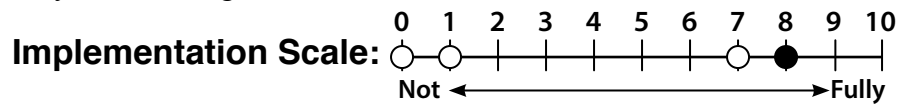
March 2011 Rating: 0

March 2012 Rating: 1

March 2013 Rating: 1

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The district updated its inventory of equipment, vehicles and facilities. The district has developed a vehicle replacement plan.

Findings

1. The district has updated its vehicle and bus replacement schedule for both its white and yellow fleet vehicles, as well as its capital equipment inventory. The district has also updated its inventory of facilities.

Recommendation for Recovery

The district should:

1. Continue to update its equipment inventory and vehicle replacement plan each year.

Standard Fully Implemented

February 2010 Initial Rating: 0

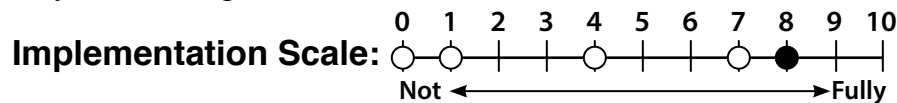
March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 4

June 2014 Rating: 7

May 2015 Rating: 8



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 Sixth Comprehensive Review, May 2015

The district has included a plan for ensuring the equity of its school sites in its school facilities planning committee process. The committee has identified improvement projects at all school sites and has budgeted for projects in the 2013-14 and 2014-15 school years. The district is expected to receive funds through the state Emergency Repair Program.

Findings

1. The district has incorporated a plan for ensuring the equity of its school sites into its school facilities planning committee process.
2. The district's facilities planning committee, consisting of school district administrators, a board member, and community members, has met regularly over the past year to discuss facilities issues, and regularly discusses the issue of equity between school sites. The committee has identified improvement projects at all school sites and has budgeted for projects in the 2013-14 and 2014-15 school years.
3. The district's School 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 recently signed a service agreement with JK Architects for various facility improvement projects at each of its schools.
5. The district's application to the state's ERP identifies \$1,888,121 in needed repairs for King City High School and \$78,696 for Greenfield High School. The state has recently indicated that the program will receive funding in 2014-15 or 2015-16.

Recommendations for Recovery

The district should:

1. Continue to include planning that ensures equity between its school sites as part of its regular facilities planning committee meetings.
2. Review and complete the projects identified in its ERP application to ensure continuing equity in the quality of its school sites.

Standard Fully Implemented

February 2010 Initial Rating: 0

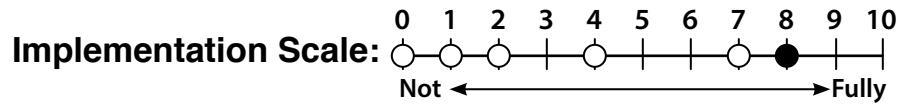
March 2011 Rating: 1

March 2012 Rating: 2

March 2013 Rating: 4

June 2014 Rating: 7

May 2015 Rating: 8



8.2 Community Use of Facilities

Professional Standard

The LEA has a plan to promote community involvement in schools.

Summary of Sixth Comprehensive Review, May 2015

The district continues to discuss and promote community involvement with various community groups, and community groups continue to work with the district on school projects. The district continues to make all donor and support groups aware that regulatory agencies require compliance with certain regulations when school facilities are built or modified.

Findings

1. The district is continuing to work with groups such as the Mustang Bench Athletic Boosters, Greenfield High School Boosters, Lutheran church, King City Beautification Committee and others to help it complete facility projects.
2. The district continues to make all community groups for facility projects aware that regulatory agencies require compliance with certain regulations and have jurisdiction over the alteration or repair of school 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, plan for school improvements, and promote community awareness.
4. District and school administrators have indicated that external agencies and community groups continue to use school facilities regularly.
5. The district has updated its fee schedule for the use of its facilities.

Recommendations for Recovery

The district should:

1. Continue to use the facilities planning committee to help increase community involvement in the schools.
2. Continue to monitor and adjust its facility fee schedule for community and public agency use as needed.

Standard Fully Implemented

February 2010 Initial Rating: 2

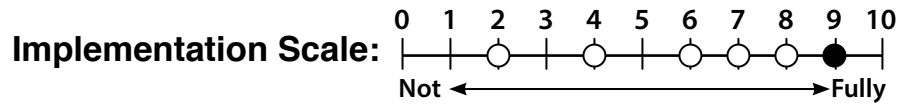
March 2011 Rating: 4

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district's facilities planning committee continues to meet 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, and through updates at its board meetings.

Findings

1. The district's facilities planning committee continues to meet quarterly to review facility needs. The committee is chaired by the state administrator and is composed of district personnel, a school board member, and community members. The committee has reviewed current and future building projects, safety issues, and preventive maintenance projects. The committee has also identified capital projects at each site for facilities repair and improvement, such as a new track for King City High School and replacing all modular classrooms at Portola-Butler High School. During this fiscal year the district is expected to receive \$1,966,817 from the state's ERP.
2. The state administrator continues to provide facilities-related information to the local Rotary club to increase public awareness of the condition of the district's facilities and plans for improvement.
3. The district continues to provide the public with information on school conditions regularly through the FIT, which is mandated by the Williams act; this information is available 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 planning committee. Prepare minutes from those meetings to share with the public at regular meetings of the board of trustees.
2. Plan for the expenditure of funds authorized for the projects identified at King City and Greenfield high schools on the district's ERP application.
3. Consider making a regular report on facilities and facilities-related matters at its monthly school board meeting.

Standard Fully Implemented

February 2010 Initial Rating: 0

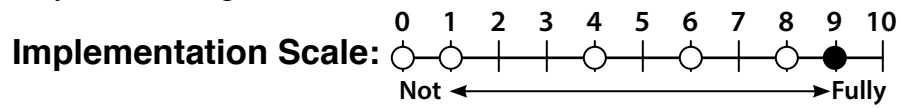
March 2011 Rating: 1

March 2012 Rating: 4

March 2013 Rating: 6

June 2014 Rating: 8

May 2015 Rating: 9



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 Sixth Comprehensive Review, May 2015

The district continues to adhere to industry-standard purchasing practices and protocols established by the business office. The MOTF technician monitors the MOTF department's purchasing, including open purchase orders to all vendors.

Findings

1. The purchasing process developed by the district's business office requires a completed and department-approved purchase requisition for all purchases.
2. The district maintains open purchase orders with local vendors for routine purchases of frequently-used items. Receipts for these purchases are filed in a binder that corresponds to the open purchase order.
3. The MOTF technician monitors the MOTF department's purchasing processes, including open purchase orders to vendors.
4. The MOTF director approves all purchase requisitions issued by the department.
5. The district has not updated its board policy that pertains to purchasing and governs the use of open purchase orders, maximum dollar amounts on open purchase orders, and authorization requirements.

Recommendations for Recovery

The district should:

1. Continue to adhere to the purchasing process implemented 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

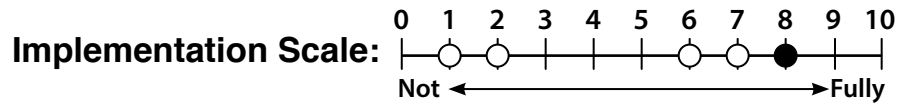
March 2011 Rating: 2

March 2012 Rating: 6

March 2013 Rating: 7

June 2014 Rating: 8

May 2015 Rating: 8



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 (02/09/15)
2. Staff meeting agenda for emergency procedures school safety plan (12/11/14)
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. Districtwide comprehensive safety plan verification Form 2014-15 (01/26/15)
7. King City High School safety plan sign-in sheet (12/11/14)
8. King City comprehensive school safety plan adoption form (12/19/14)
9. Greenfield comprehensive school safety plan adoption form (02/09/15)
10. King City and Greenfield high school fire evacuation drill procedures and map (11/07/12)
11. Emergency preparedness teacher class status form (No date)
12. King City and Greenfield high school lockdown procedures ((2/05/13)
13. King City and Greenfield high school reaction plan (1/14/13)
14. King City and Greenfield high school fire drill calendar (2/15/15)
15. Board Policy 3515 9 (a) (b), and Administrative Regulations for Campus Security (9/08/10)
16. Facility Inspection Tool (FIT) for King City and Greenfield high schools (04/03/14)
17. Monterey County Office of Education emergency response training sign-in sheet (10/04/14)
18. Monterey County Office of Education comprehensive safe school plan training sign-in sheet (09/22/14)
19. Keenan forklift training employee certification (10/23/14)

20. Keenan property and liability inspection follow-up audit (04/01/14)
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 (11/17/14, 1/12/15)
27. Facilities five-year deferred maintenance plan and facility listing of expenditure plan
28. List of nonconforming buildings compiled by NTD Architects (undated)
29. File close-out status of all non-conforming buildings from NTD Architects (undated)
30. DSA certification and close of file for King City High School (10/03/13), (06/13/13), (11/06/13), (05/16/13)
31. 2014-15 account summary for resource 8110 and 8200 (01/28/15)
32. JK Architecture agreement for services (11/30/14)
33. BFS Landscape Architecture agreement for services (10/28/14)
34. District organizational chart (07/07/14)
35. Organization chart for King City High School (02/18/15)
36. Organization chart for Greenfield High School (02/18/15)
37. Board Policy 1330 (a) (b), Use of Facilities (10/09/13)
38. Injury and Illness Prevention Plan (2014-15)
39. Employee safety training records (2014-15), training complete through February 10, 2015
40. Comprehensive safety plan for King City and Greenfield high schools (2014-15)
41. Job descriptions for grounds workers, custodial and maintenance positions (2014-15)

42. Custodial cleaning standards (2014-15)
43. Maintenance staff assignments/schedules (2014-15)
44. Material Safety Data Sheets for King City and Greenfield high schools
45. Greenfield High School 3-A diagrams (10/04/95)
46. King City High School 1-A diagrams (06/05/89)
47. MOTF Department equipment and asset inventory (01/13/15)
48. MOTF Department equipment replacement schedule (undated)
49. Facilities master plan (2010-11)
50. Sample work orders (2014-15)
51. 2014-15 First Interim Report with Facilities, Maintenance, Operations & Transportation budget information (12/09/14)
52. Parent-student handbook (2014-15)

Appendix B

Positions Interviewed

The FCMAT study team interviewed the following positions on February 9 and 10, 2015 to evaluate the standards in the facilities section:

1. State administrator
2. MOTF director
3. Human resources administrator
4. Principal, King City High School
5. Principal, Greenfield High School
6. Chief business official
7. School board members (4)
8. CTA representative
9. Senior director technology
10. Acting principal, Portola-Butler Continuation High School

Table of Facilities Management Ratings

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
1.1	LEGAL STANDARD – SCHOOL SAFETY The LEA has adopted policies and regulations and implemented written plans describing procedures to be followed in case of emergency, in accordance with required regulations. All school administrators are conversant with these policies and procedures. (EC 32001-32290, 35295-35297, 46390-46392, 49505; GC 3100, 8607; CCR Title 5, Section 550, Section 560; Title 8, Section 3220; Title 19, Section 2400)	2	4	5	5	9	10
1.3	LEGAL STANDARD – SCHOOL SAFETY The LEA has developed a comprehensive safety plan that includes adequate measures to protect people and property. (EC 32020, 32211, 32228-32228.5, 35294.10-35294.15)	4	4	4	4	6	8
1.8	LEGAL STANDARD – SCHOOL SAFETY School premises are sanitary, neat, clean and free from conditions that would create a fire or life hazard. (CCR Title 5, Section 630)	3	4	5	7	8	8
1.9	LEGAL STANDARD – SCHOOL SAFETY The LEA complies with Injury and Illness Prevention Program requirements. (CCR Title 8, Section 3203)	0	3	5	5	8	9
1.15	LEGAL STANDARD – SCHOOL SAFETY The LEA maintains updated Material Safety Data Sheets for all required products. (LC 6360-6363; CCR Title 8, Section 5194)	1	4	8	9	10	10
1.16	PROFESSIONAL STANDARD – SCHOOL SAFETY The LEA has a documented process for issuing and retrieving master and sub-master keys. All administrators follow a standard organizationwide process for issuing keys to and retrieving keys from employees.	2	5	8	8	10	10
1.18	PROFESSIONAL STANDARD – SCHOOL SAFETY Outside lighting is properly placed and is monitored periodically to ensure that it functions and is adequate to ensure safety during evening activities for students, staff and the public.	1	1	2	6	8	8

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
1.20	PROFESSIONAL STANDARD – SCHOOL SAFETY The LEA maintains a comprehensive employee safety program. Employees are made aware of the LEA's safety program, and the LEA provides in-service training to employees on the program's requirements.	0	1	1	1	6	7
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	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	10
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	9
2.8	PROFESSIONAL STANDARD – FACILITY PLANNING The LEA has a facility planning committee.	0	0	5	7	8	9
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	9
3.3	LEGAL STANDARD – FACILITIES IMPROVEMENT AND MODERNIZATION All relocatable buildings in use meet statutory requirements. (EC 17292)	0	0	2	3	7	8
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	10

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
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	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	9
4.2	PROFESSIONAL STANDARD – CONSTRUCTION OF PROJECTS The LEA maintains appropriate project records and drawings.	2	3	5	4	7	8
6.4	PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS To safeguard items from loss, the LEA keeps adequate maintenance records and reports, including a complete inventory of supplies, materials, tools and equipment. All employees who are required to perform custodial, maintenance or grounds work on LEA sites are provided with adequate supplies, equipment and training to perform maintenance tasks in a timely and professional manner.	1	2	6	6	8	9
6.5	PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS Procedures are in place for evaluating the quality of the work performed by maintenance and operations staff, and evaluations are completed regularly.	0	1	6	7	9	10
6.6	PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS The LEA has identified major areas of custodial and maintenance responsibility and specific jobs to be performed. Written job descriptions for custodial and maintenance positions delineate the major areas of responsibility for each position	2	2	6	7	8	8

Facilities Management Standards		February 2010 Rating	March 2011 Rating	March 2012 Rating	March 2013 Rating	June 2014 Rating	May 2015 Rating
6.7	PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS The LEA has an effective written preventive maintenance plan that is scheduled and followed by the maintenance staff and that includes verification of work completed.	0	0	1	1	7	8
6.8	PROFESSIONAL STANDARD – FACILITIES MAINTENANCE AND OPERATIONS The LEA has planned and implemented a maintenance program that includes an inventory of all facilities and equipment that will require maintenance and replacement. Data should include estimated life expectancies, replacement timelines and the financial resources needed to maintain the facilities.	0	1	4	4	7	8
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
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
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	9
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	8
Collective Average Rating		1.04	2.15	4.85	5.63	8.15	8.44

The collective average ratings for all previous years are based on the subset of priority standards used starting with the second comprehensive review. Of these, Standard 2.2 is no longer applicable or included in the ratings as of the fifth comprehensive review.